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**The Final Findings of Fact and Record of Decision Document, which is a part of the Environmental Assessment Worksheet prepared by the City of Minneapolis for the DeLaSalle High School Athletic Facility proposed for One DeLaSalle Drive on Nicollet Island in the City of Minneapolis, is now available for public review**

The Environmental Assessment Worksheet (EAW) provides information regarding the potential environmental effects of the DeLaSalle High School Athletic Facility Project (Project). The Project is an addition of a regulation size football field at the School campus on Nicollet Island. The use of the field will be shared by DeLaSalle and the Minneapolis Park and Recreation Board (MPRB). The new field, when not used for football, will provide one regulation size soccer field or three junior soccer fields. The use of this new football and soccer facility will be shared by DeLaSalle and by the MPRB. The athletic field will be built on two parcels of land presently divided by Grove Street, one owned by DeLaSalle, and one owned by the MPRB. The portion of the existing Grove Street right-of-way between Nicollet Street and East Island Avenue dividing the parcels would be vacated for the Project. The Project site is located within the St. Anthony Falls Historic District.

In addition to the record of the decision-making process, the Findings Document includes copies of the comments received on the EAW and responses to the substantive comments. Copies of the Findings of Fact and Record of Decision Document and the EAW are available for review at the downtown Minneapolis Public Library located at 250 Marquette Ave., the Southeast Community Library located at 1222 SE 4th St., and in the office of the City Planning Division at 210 City Hall. **It is also available for review on the City of Minneapolis web site:**

**<http://www.ci.minneapolis.mn.us/planning>**. Paper copies of this Findings Document and EAW and a compact disk of the report can also be provided upon request to Michael Orange (refer to contact information below).

For further information, contact J. Michael Orange, Principal Planner, Minneapolis Planning Division, Community Planning and Economic Development Department, City Hall Room 210, 350 S. 5th Street, Minneapolis, MN 55415-1385, by telephone at 612-673-2347, or E-mail at [michael.orange@ci.minneapolis.mn.us](mailto:michael.orange@ci.minneapolis.mn.us).

**Attention:** If you want help translating this information, call - **Hmong** - Ceeb toom. Yog koj xav tau kev txhais cov xov no rau koj dawb, hu 612-673-2800; **Spanish** - Atención. Si desea recibir asistencia gratuita para traducir esta información, llama 612-673-2700; **Somali** - Ogow. Haddii aad dooneyso in lagaa kaalmeeyo tarjamadda macluumaadkani oo lacag la' aan wac 612-673-3500

## FINAL FINDINGS OF FACT AND RECORD OF DECISION

### ENVIRONMENTAL ASSESSMENT WORKSHEET For the DeLaSalle High School Athletic Facility Project

**Location: One DeLaSalle Drive on Nicollet Island in the City of Minneapolis,  
Hennepin County, Minnesota**

**Responsible Governmental Unit: City of Minneapolis**

**Responsible Governmental Unit**

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#### **I. ENVIRONMENTAL REVIEW AND RECORD OF DECISION**

The City of Minneapolis prepared a Mandatory Environmental Assessment Worksheet (EAW) for the DeLaSalle High School Athletic Facility Project (Project) according to the Environmental Review Rules of the Minnesota Environmental Quality Board (EQB) under Rule 4410.4300 subpart 31 Historical Places. The Project proposes demolition of a structure (a portion of Grove Street) within the St. Anthony Falls Historic District. Exhibit A includes the Project summary, and Exhibit B includes the Record of Decision.

The City concluded that the destruction of a significant stretch of this historic street meets the definition of the Mandatory EAW category pursuant to Minnesota Rules at §4410.4300 Subp. 31: Historical Places for the following reasons: The Rules call for a Mandatory EAW, "For the destruction, in whole or part, or the moving of a property that is listed in the National Register of Historic Places or State Register of Historic Places." The U. S. Department of the Interior manages the National Register and the registration process, and the Department's report, "Guidelines for Counting Contributing and Noncontributing Resources for National Register Documentation" (revised 11/86) provides definitions for the various types of resources for listing on the Register.

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The definition of the term “structure” in the report “is used to distinguish from buildings those functional constructions made usually for purposes other than creating shelter.” The listed examples of structures included highways, railroad grades, bridges, tunnels, and systems of paths and roadways.

The proposed Project is located on Nicollet Island, the entirety of which is located in the St. Anthony Falls Historic District. This District was listed on the National Register of Historic Places on March 11, 1971 and was designated by the State of Minnesota in 1971. The proposal calls for the complete removal and destruction of a one-block stretch of Grove Street, nearly half of the entire length of the street. This historic street existed during the period of significance for the District and has continued in its historic use, in its historic alignment for nearly 140 years.

### **II. EAW NOTIFICATION AND DISTRIBUTION**

On October 21, 2005, the City caused the EAW to be published and distributed to the official EQB mailing list and to the Project mailing list. The EQB published notice of availability in the *EQB Monitor* on October 24, 2005. A public comment meeting on the EAW was held on November 15, 2005. Exhibit C includes the public notification record and these mailing lists and Exhibit E includes information about the Public Comment Meeting.

### **III. COMMENT PERIOD, PUBLIC MEETING, AND RECORD OF DECISION**

Exhibit D includes the comment letter received. The Zoning and Planning Committee of the Minneapolis City Council considered the EAW and the draft of this “Findings of Fact and Record of Decision” document during its December 15, 2005, meeting. Notification of this public meeting was distributed via the City’s standard notification methods and to the official list of registered organizations (refer to Exhibit C).

### **IV. SUBSTANTIVE COMMENTS RECEIVED AND RESPONSES TO THESE COMMENTS**

The City received 53 written comments throughout the completion of the EAW. Exhibit D includes the list of the persons, agencies, companies, and organizations that submitted written comments and the entire submission. Comments were also received at the Public Comment Meeting held on 11/23/05. Exhibit E includes the sign-in sheet (42 people signed in) and a summary of the comments at the Public Comment Meeting. The official record of the meeting is the audio tape made during the meeting (available for listening during normal business hours in Room 210 City Hall).

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To expedite the review of the 173 pages of comments from 45 people received during the public comment period, the two hours of testimony from the 20 speakers at the Public Comment Meeting, the comments have been grouped into the following seven general categories:<sup>1</sup>

1. The impact of the Project on the interpretation of the St. Anthony Falls Historic District and the historic character of Nicollet Island
2. The conformance of the Project with the applicable plans and polices for the area
3. The impacts on vehicular circulation and parking, pedestrian impacts, and the Travel Demand Management Plan.
4. The impact of the Project on the residences on Nicollet Island and the East Bank
5. The EAW did not study all of the connected and phased aspects of the Project, including the relocation of the tennis courts.
6. Need to consider alternative sites not located on Nicollet Island, perhaps through an EIS
7. Other comments

Because of the large number of commentators and the large volume of comments, many of which are very similar to others, the following analysis includes only a representative sampling of the comments that are summarized for each topic area. However, reviewers are encouraged to read the entire record found in Exhibits D and E.

**1. The impact of the Project on the interpretation of the St. Anthony Falls Historic District and the historic character of Nicollet Island:**

**a) Impact on Grove Street** (Chaffee, Minnesota Historical Society, National Park Service):

**Minnesota Historical Society (MHS):** “Grove Street currently establishes a strong visual and functional demarcation for the northern portion of the Island.”

**National Park Service (NPS):** “Grove Street is one of the anchors that define the historic setting of Nicollet Island. Its presence on the Island since the late 1860’s grounds us in how historic events developed along and around it. Grove Street is one of the few through streets on the Island, running from one side of the Island to the other. As such, it is a defining feature of the Island’s landscape which helps interpret aspects of the Island’s history. It does not require buildings lining the eastern end to serve this purpose.”

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<sup>1</sup> An additional 47 pages were received after the completion of the draft “Findings” document for a total written record of 220 pages.

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**RGU response:** These comments address and reinforce the consultant's finding in the response to Question 25 of the EAW and in her report (included by reference in the EAW) that elimination of this portion of Grove Street will constitute an adverse impact on the historic district. During the Minneapolis Heritage Preservation Commission's (HPC) review of this Project (as noted in the response to Question 8 in the EAW), the HPC will assess the opportunity for and efficacy of mitigation of this adverse impact.

- b) Impact of stadium construction** (Hively, Kahn, Belfiore, Christenson, Fournier, National Park Service, Minnesota Historical Society, Chaffee, Roscoe, Mack, Preservation Alliance of Minnesota):

**National Park Service:** "The proposed mast lighting would adversely affect the district, particularly since the Island has 360 degree visibility."

**Minnesota Historical Society:** "Among the factors contributing to this impact are potential changes in the volume and patterns of traffic, increased lighting, and general intensification of land use."

**Chaffee:** "People on historic tours, which occur quite frequently, would not be able to stand and look at the Flats without seeing the grandstand. It would be a jarring incongruity."

**RGU response:** Commentators concluded the facility would have an adverse effect on the historic character of the Island. The character of Grove Street Flats and the character of the Island are described in the consultant's report in the EAW. During the HPC's review of this Project (as noted in the response to Question 8 in the EAW), the HPC will determine whether an adverse effect on Grove Street Flats or on the historic character of the Island will result, and the HPC will address the opportunity for and efficacy of mitigation of any potential adverse effects.

The applications for the Certificate of Appropriateness to the HPC and the Land Use Approvals to the City Planning Commission will provide much greater detail of the intentions for the design and specific plan of the facility described in the response to Question 6b and illustrated by Attachments C and D in the EAW. These submissions will also include illustrations of the views of the lighting from points on and off the Island, which will be identified by HPC staff.

- c) Archeology** (National Park Service, Minnesota Historical Society): The recommendations of the consultant for study should be implemented

**RGU response:** The response to Question 25 in the EAW provides DeLaSalle's commitment to consult with the Minneapolis HPC, the State Historic Preservation Office, and the Minnesota Historical Society to define the appropriate program to provide an archaeological investigation of the site, and will have that program in place before any land disturbance is initiated.

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**2. The conformance of the Project with the applicable plans and polices for the area:**

**a) Regional Park Policies** (Kahn, Chaffee, Parks and Trails Council of Minnesota, Brazaitis)

**Kahn:** “It is also inconsistent with metropolitan regional park principles that preclude sites for active recreation . . . . MN Statute 86A.03 subp. 3 defines outdoor recreation, excluding team athletic activities . . . .”

**RGU response:** Nicollet Island is identified as a regional park under the jurisdiction of the Minneapolis Park and Recreation Board (MPRB) in the response to Question 9 of the EAW. The regional park system consists of 52,000 acres in 47 regional parks and park reserves, 6 special recreation features, such as the Como Zoo and Conservatory, 22 regional trails, with 170 miles currently open to the public, used by more than 30 million annual visitors. The Regional Parks Policies Plan (<http://www.metrocouncil.org/planning/parks/2005/ParksPlan.htm>) guides the 10 implementing agencies (Anoka County, Carver County, City of Bloomington, City of St. Paul, Dakota County, MPRB, Ramsey County, Scott County, Three Rivers Park District, and Washington County) as they apply for regional funding to acquire land for new parks and develop or redevelop existing park lands.

The recreational activities selected as prime candidates for accommodation by the system are picnicking, camping, swimming, conservation, nature interpretation, fishing, boating; as well as trail uses such as ski touring, hiking and walking, bicycling, equestrian, and, in some cases, snowmobiling. As the regional system was being created in the 1970s, several preexisting parks were included that had activities not currently considered appropriate for inclusion in the regional system. Many of these activities continue to operate quite legitimately, but they are not eligible for regional funding for improvement or expansion.

As an implementing agency, the MPRB, not the City of Minneapolis, implements these policies as it seeks regional funding for the eligible parks in Minneapolis, and, as noted in the response to Question 8, to allow entering into the proposed lease agreement with DeLaSalle (refer to Attachment F in the EAW).

Several reviewers determined the Project is not in compliance with these policies. Their comments are noted for the record.

**b) Mississippi National River and Recreation Area (MNRRA)** (Kahn, Friends of the Mississippi River, National Park Service, Brazaitis):

**National Park Service:** “The proposed athletic complex is not in keeping with the Comprehensive Management Plan’s general criteria for compatible riverfront uses.”

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**RGU response:** The response to Question 27 in the EAW identifies the Recreation Area and the six purposes of the Area as defined in the plan. The reviewer was invited to determine if, on balance, the Project is in compliance with the overall purpose and intentional policies of the Plan. Several reviewers, including the National Park Service, determined the Project is not. Their comments are noted for the record.

- c) **Critical Area Plan** (Viken, Friends of the Mississippi River, Brazaitis): The proposed athletic facility is inconsistent with the Executive Order and the City's Plan

**RGU response:** The City's Critical Area Plan and the Urban Diversified designation of the Executive Order are identified and discussed in the response to Question 14 of the EAW. The Critical Area Plan polices will be part of the City's evaluation and decision-making process required as a part of the conditional use permit required for this use. Reviewers have determined the Athletic Facility is not in compliance with these policies. Their comments are noted for the record.

- d) **Nicollet Island Master Plan (1996)** (Kahn, Chaffee, NIEBNA, Hondros, Brazaitis): The proposal conflicts with the 1996 Nicollet Island Master Plan, and the Plan, not the 1983 agreement, is the Plan for the Island

**RGU response:** The 1983 agreement is first discussed in the response to Question 9 of the EAW to assist in understanding the present pattern of uses on the Island; and again in the response to Question 25, "Designated parks, recreation areas or trails," as a reference to a possible park use on the Island. Immediately following that discussion, the 1996 Nicollet Island Master Plan was identified and its seven objectives listed. The MPRB Staff describe this plan as providing the schematic or blueprint for the public investments on the Island during the late 1990s and early 2000s. The EAW makes no assertion on which document is the most valid or controlling. Some reviewers make this assertion and their comments are noted for the record.

- e) **The Minneapolis Plan:**

**Brazaitis:** The EAW should include the following from the *Minneapolis Plan*:

*The Traditional Street Grid.*

The residential street grid laid onto the city from its earliest days has provided yet another powerful organizing force for our neighborhoods. Since the first residents claimed title to land along the Mississippi in the 1850's, the street grid has exerted a great deal of influence over land subdivision. The grid is a primary organizing element, easily understood and navigable by all, whether a neighborhood is familiar or foreign to the traveler. ...Maintaining the grid patten of our streets and "healing" it by re-establishing connections wherever possible is a strong prerogative for the continued vitality of city neighborhoods. ... Being able to find one's way through

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unfamiliar territory brings tremendous benefit to the urban landscape. Whenever possible, new development should correspond to the historical street grid pattern.

Policy 9.13: Minneapolis will restore and maintain the traditional street grid.

Implementation Steps (selected):

- Maintain the street grid as the preferred option while evaluating new development of potential street changes.
- Restore the street grid whenever possible.
- Restore the historic connectivity of street corridors by working with property owners and city agencies on reopening streets such as Nicollet at Lake.”

Policy 6.1: Minneapolis will identify, protect and manage environmental resources so that they contribute to resident’s experience of nature, the parks system and the city. Incorporate protection, conservation and maintenance of the natural environment in the design and operation of parks, streets, open spaces and related facilities. Encourage planting of native vegetation on parklands and green spaces. Provide and maintain habitat for resident and migratory songbirds and waterfowl, and other wildlife.

Policy 6.4: Park Safety and Security. The parks must be shown to be safe environments, free from the possibility of harm or threats to individual or community safety. Good design can accomplish a great deal to this end....visual sight lines have much to contribute to making parks safer, more secure places.

Policy 7.4: Minneapolis will encourage the planting and preservation of trees and other vegetation.

**RGU comment:** So noted for the record.

**3. The impacts on vehicular circulation and parking, pedestrian impacts, and the Travel Demand Management Plan** (Hively, Chaffee, Kahn, Belfiore, Christenson, Richardson, NIEBNA, Rose, Metropolitan Council, Viken, Carlson, Berg, Martin, Stellar, Brazaitis):

- a) **Circulation:** A trial closure of Grove St. should be attempted. What about emergency access?

**Hively:** “This is a street that is often crowded now with school buses and Christian Brothers visitors and residents of the Kerwin Flats and Grove Street Flats.”

**Richardson:** “With half of the access to the rail overpass on Nicollet Street closed, you have a situation guaranteed to produce more than a few irate and frustrated motorists.”

**RGU response:** The traffic consultant confirmed that while a trial closure of Grove Street could be done, but is not necessary. The volumes on Nicollet Island, as

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documented in the Travel Demand Management Plan, do not warrant a trial closure. The closure of Grove Street will not have a significant impact on the traffic patterns on Nicollet Island.

The emergency vehicle route is currently West Island Avenue to Grove Street to Nicollet Street. The Grove Street closure will not affect emergency vehicle service. Comments from the City's emergency service providers are an important part of the consideration of any street vacation by the City.

The school buses and much of the other school traffic move in a clockwise pattern around the school site. The school buses will circulate inside the parking lot and on the south side of Nicollet Island Avenue if Grove Street is closed.

Motorists are typically frustrated when they have to wait for a train at an at-grade crossing. If northbound motorists on Island Ave. E. do not want to wait for the train to pass, they could drive through the existing gravel lot to turn around and then drive around the southern end of the Island to get to the Island Ave. W. and the via Grove St. to the Nicollet Street overpass.

- b) Travel Demand Management Plan:** The Travel Demand Management Plan does not account for the overlap of stadium and other events, and the breakdown of shared roadways.

**Chaffee:** "Under Item 21, the methodology of the traffic study is inappropriate. Traffic standards for residential neighborhoods should not be used. Nicollet Island is quite different from an ordinary residential neighborhood, in that it is shared with hundreds of thousands of Regional Park visitors. More importantly, the roadways are shared by motor vehicles, horse-drawn carriages, pedestrians, bicyclists, Segway riders, and persons in wheelchairs. This arrangement is not accidental. It was the subject of intense discussion during the 1996 Master Plan process."

**Christenson:** "The EAW ignores traffic patterns associated with the 750,000 other annual visitors to Nicollet Island. By focusing just on the football game traffic issues, the EAW understates and fails to properly evaluate the environmental impacts associated with closing East Grove Street."

**RGU response:** Traffic data was collected from Wednesday through Sunday during the second week in September to capture the school use combined with other early fall activities on the Island. The weekday volumes in the report represent the busiest day of the week. The Friday night varsity football game will be the most intense use of the athletic facility. The study addresses the combined traffic with the addition of a varsity football game.

The busiest street on the north half of the Island is Island Avenue East south of Grove Street. It carries 87 vehicles during the morning hour when school is starting (this will actually go down when the buses can't use Grove Street to circulate on

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the north side of the Island). This is approximately one car every 40 seconds during the busiest hour of the week on the busiest street. Most of the other streets average a car every couple of minutes. Even with the closure of Grove Street, traffic patterns are not going to shift significantly. This amount of traffic is compatible with the shared roadway concept and use by pedestrians, carriages, Segways, etc.

- c) **Parking:** It's important to get it right on an island. The parking on Parcel C, including the environmental capabilities of the proposed paver system should have been discussed in the EAW. This parcel should not be dedicated to parking; long term parking use is in conflict with the 1996 Plan. The study should have considered the overlap with other events on the Island and major events like the 4th of July fireworks.

**RGU response:** The use of this area for event parking is an informal but practical response to event parking for the school, the hotel, and the Pavilion. Whether this is an appropriate use that should be formalized and brought into conformance with standards and requirements was discussed but not resolved during the Citizen Advisory Committee review of the Project.

This parking area was identified in the EAW as "Parcel C" in the response to Question 6 b of the EAW. It is identified as a parcel that is proposed to be improved by DeLaSalle to better meet the requirements for parking at school and other Island events, but not as a part of the athletic field project. The EAW, in the response to Question 6c, noted that improvement of this parking area and bringing it into conformance with City parking regulations was one of purposes of the Project. The potential to improve this parking area as an enhancement of the Project is also noted in the response to Question 7. In the response to Question 10, the description of cover types specifically excludes the public parking area. In the response to Question 21 the parking analysis for the Project assumes continued availability of this area for parking and its use by spectators in addition to other parking on the DeLaSalle property.

Commentators argue the area should no longer be used for parking, and, if it is to continue to be used for parking, it should have been addressed in the EAW including the design and impact of bringing the site into conformance with MPRB standards and City regulations and the potential enhancement of using porous pavers rather than a bituminous surface.

No decision has been reached by the MPRB to formally recognize the now informal use of the area for parking. If the MPRB determines the appropriate use is parking, it must be improved. The environmental impacts of this improvement, when or if it occurs, will be mitigated by the design and materials approved by the MPRB and the regulations of the City.

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The adequacy of the parking for the facility, and how it will be provided, is specifically regulated by the City Zoning Code and will be specifically addressed during the City's land use approval process for this Project.

- d) Bicycle path** (Brazaitis): The EAW ignores that the Project will block the plan to connect the Island to Boom Island via a bridge for bicycles to the east of Grove Street. The proposed 4-ft. pedestrian path is inadequate.

**RGU comment:** The Project will have no substantive effect on the existing pedestrian/bicycle bridge on the north side of the Island that connects to Boom Island. As regards the proposed 4-ft.-wide pedestrian path, the reviewer's extensive comments are available in the record for comparison with the Public Works standards for sidewalks during the project review stage.

**4. The impact of the Project on the residences on Nicollet Island and the East Bank** (Chaffee, Kahn, Dreon, Brazaitis):

- a) Restoration of historic buildings** (Chaffee): "The residential parcels mentioned were not acquired for park use, and were never intended for that purpose. . . . The purpose of the lease arrangement was to enable the Park Board to monitor the restoration and use of the historic buildings. As recited in the lease document, the Park Board and MCDA agreed that the historic buildings would be an asset to the adjacent park, which they have proven to be."

**RGU response:** The importance of assuring compatibility of residential use is provided in the City policies and regulations in the response to Question 27 in the EAW. These policies will be implemented and the standards of the regulations enforced by the land use approval process of the City.

- b) Noise:** (Kahn, Bartl, Sheran, Viken, Brazaitis): While technically meeting the MPCA standards it will be intrusive in the passive character of the park and for the residents.

**Bartl:** "I hardly think that the loudspeakers at DeLaSalle High School's stadium could be any more intrusive into my waking and (often interrupted) sleeping hours as the trains that constantly rumble, roar and squeak by my home."

**Brazaitis:** It should be anticipated that this facility will be used for music. Large speakers can easily be brought in and used for other performances. Their large capacity could easily violate the noise standards.

**RGU response:** The predicted crowd and loudspeaker noise levels, their conformance with MPCA standards, and mitigation techniques to reduce the loudspeaker sound levels are discussed in the response to Question 24 in the EAW.

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Chapter 537.110 2 of the Zoning Code, found in Section 27 Land Use Regulations of the EAW, provides the requirement to minimize the effects of lighting and noise on surrounding property. This requirement is also part of the findings necessary for granting the required conditional use permit.

- c) **Lighting** (NIEBNA): Lighting levels should be reduced from that permitted by the Code.

**RGU response:** Lighting levels are regulated in section 535.590 of the Code as follows:

**535.590. Lighting.** (a) *In general.* No use or structure shall be operated or occupied as to create light or glare in such an amount or to such a degree or intensity as to constitute a hazardous condition, or as to unreasonably interfere with the use and enjoyment of property by any person of normal sensitivities, or otherwise as to create a public nuisance.

(b) *Specific standards.* All uses shall comply with the following standards except as otherwise provided in this section:

(1) Lighting fixtures shall be effectively arranged so as not to directly or indirectly cause illumination or glare in excess of one-half (1/2) foot-candle measured at the closest property line of any permitted or conditional residential use, and five (5) foot-candles measured at the street curb line or nonresidential property line nearest the light source.

(2) Lighting fixtures shall not exceed two thousand (2,000) lumens (equivalent to a one hundred fifty (150) watt incandescent bulb) unless of a cutoff type that shields the light source from an observer at the closest property line of any permitted or conditional residential use.

(3) Lighting shall not create a sensation of brightness that is substantially greater than ambient lighting conditions as to cause annoyance, discomfort or decreased visual performance or visibility to a person of normal sensitivities when viewed from any permitted or conditional residential use.

(4) Lighting shall not create a hazard for vehicular or pedestrian traffic.

(5) Lighting of building facades or roofs shall be located, aimed and shielded so that light is directed only onto the facade or roof.

(c) *Exceptions.* The uses listed below shall be exempt from the provisions of this section as follows:

(1) Publicly controlled or maintained street lighting and warning, emergency or traffic signals shall be exempt from the requirements of this section.

(2) Athletic fields and outdoor recreation facilities serving or operated by an institutional or public use that otherwise meet all of the requirements of this zoning ordinance shall be exempt from the

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requirements of sections (b)(1), (b)(2), and (b)(3) between the hours of 7:00 a.m. and 10:00 p.m., because of their unique requirements for nighttime visibility and limited hours of operations.

Note the exception provided until 10 p.m. for athletic fields.

The proposed lighting levels for the field are discussed in the response to Question 26 in the EAW and in the consultant's report on lighting that is part of the EAW, specifically Figure 26.3, Lighting Distribution Map (attached herein with Exhibit F). The lighting intensities at the athletic field site boundary described in Figure 26 along Nicollet range from 0.40 foot-candles (ftc) at Grove and Nicollet St., to 0.10 ftc at the railroad tracks, and 0.22 ftc to 0.46 ftc along East Island Avenue. This will assure the Project will likely be below the ½-ftc standard at adjacent property lines.

Chapter 525.340 of the Zoning Code, found in the response to Question 27 Land Use Regulations in the EAW, provides the requirement to minimize the effects of lighting and noise on surrounding property. This requirement is also part of the findings necessary for granting the required conditional use permit.

- 5. Need to consider alternative sites not located on Nicollet Island, perhaps through an EIS** (Chaffee, Kahn, Friends of the Mississippi River, Durkacs, Christianson, Larson, Richardson, Sierra Club, National Park Service, Fried, Roscoe, Hondros): Reviewers encourage the MPRB and DeLaSalle to consider alternate sites not located on Nicollet Island.

**RGU response:** During the MPRB Citizens Advisory Committee (CAC) process, five alternative Park Board sites not on Nicollet Island were discussed (Exhibit G provides information from DeLaSalle and the MPRB regarding alternative site considerations completed to date). These sites were B. F. Nelson Fields, Van Cleve Park, Fort Snelling, Bryn Mawr, and the Parade Stadium. After consideration of the programmatic needs of the Park Board and DeLaSalle, and the potential impacts on the resources, natural environment, and current businesses and residents, it was determined the programmatic needs of DeLaSalle and the Park Board cannot reasonably be accommodated on land that is not adjacent to Nicollet Island. The CAC, by its adopted resolution of October 4, 2005, recommended the MPRB and DeLaSalle proceed in the consideration of the proposed Project because it best addresses the existing conditions on Nicollet Island while meeting the needs of the school and the park system.

The finding by the City that the EAW has satisfactorily addressed all of the issues for which existing information could have been reasonably obtained and that it is adequate and no EIS is required provides no endorsement, approval, or right to develop the proposal by the City. This finding does not preclude the MPRB or DeLaSalle from further consideration of alternative sites for the athletic field that would avoid the impacts identified in the EAW and the comments.

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Given the history of this proposal, and the parties that are involved, an EIS prepared by the City is possibly the least efficient or effective path towards a timely consideration of alternative sites for the Project.

**6. The EAW did not study all of the connected and phased aspects of the Project, including the relocation of the tennis courts (Brazaitis, Hively, Kahn, Durkacs, Christenson, NIEBNA):**

**Brazaitis:** In addition to the facilities described in the EAW, DeLaSalle is exploring softball fields, tennis courts, batting cages, a performance shell, track and field pits, and a running track on the other side of the railroad tracks. All of these potential developments should be included in the EAW.

**RGU comment:** While the proposed agreement between the MPRB and DeLaSalle would require DeLaSalle to pay for construction of replacement tennis courts at a new location selected by the MPRB when and if the MPRB elects to replace the tennis courts, the replacement location of the tennis courts themselves is not part of this project. Although demolition of the existing tennis courts is a necessary part of the proposed project, construction of the replacement tennis courts at a new location is not a necessary result of the project. Wherever the MPRB decides to relocate the tennis courts, if anywhere, it will probably not be on Nicollet Island and will not have any facilities in common with the athletic facility, and therefore the new location will not have related or cumulative effects on the proposed project.

Replacement of the tennis courts, including alternate locations on the Island, was discussed during the Citizens Advisory Committee process but no location was recommended. There is a high probability the courts will not be replaced as the MPRB has been reducing the number of tennis courts in the City. The most probable use by the MPRB of the replacement funds will be refurbishment of existing tennis courts.

Future possible projects are not the same as an approved facility improvement plan for a known project and they do not meet the threshold of a connected or phased action. In the event DeLaSalle expanded the Project to include additional facilities after the completion of the environmental review process, the City would have to evaluate whether the environmental review continued to be valid for the revised project.

**7. Other comments**

**a) Comments relating to the term “at no cost” in the response to Question 6c:**

**Brazaitis:** The term “no cost” is misleading. While there are certain aspects to this project that will be paid by DeLaSalle, this project is hardly without cost to the MPRB or to the City and will likely cost the taxpayers millions of dollars:

- In attorney’s fees and staff expenses
- The public land that is being used for the facility is extremely valuable,

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

ranging in estimates from \$1 to \$7 million

- The land was purchased with State general obligation bonds which may have to be paid back.
- Necessary infrastructure improvements.

**RGU comment:** So noted for the record.

- b) Railroad Hazard** (Kahn, BNSF Railroad, Minnesota Department of Transportation, Brazaitis): More people will be exposed to the hazard of the rail crossings at Island Avenue West and East and additional safety measures must be installed.

**RGU response:** The comments are noted for the record. The proposed mitigating techniques will be studied and addressed as part of finding #1 required for the necessary conditional use permit.

- c) Commemorative plantings** (Christenson, Sierra Club, Johnson, Viken, Stellar):

**Christenson:** “The EAW should note that these currently small trees were planted to commemorate the 150<sup>th</sup> anniversary of the University of Minnesota. . . . In other words, the value of these trees is greater than the mere timber or lumber value of the trees due to the special significance surrounding their planting.”

**RGU response:** Noted for the record

- d) Calculations:**

- (1) **Cut/Fill** (Chaffee, Berg): The excavation estimates in the EAW are inadequate.

**RGU response:** The EAW in the response to Question 16 reports that cut and fill estimates will be balanced on site. Because no significant import or export of soil is expected, no estimate of the exact volume of the soil to be moved has been prepared beyond the prediction that only the upper 2 to 3 feet of the soil on the site will be disturbed.

- (2) **Area of Parcel C** (Chaffee, Christenson): The EAW has contradictory estimates of the Parcel C.

**RGU response:** The 0.71 acres is the surface area of Parcel C that was identified by the landscape architect as presently used for parking. The actual parcel may extend beyond the area now parked upon.

- (3) **Wastewater volume** (Minnesota Pollution Control Agency): Wastewater volume should be provided.

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**RGU response:** The estimate of existing sanitary capacity was made by City staff with knowledge of the capacity and present demand on the sanitary system in this area and the demand created by the facilities described in the response to Question 18 a.

- (4) **Railroad retaining wall** (Hively, Christenson): Was it identified for demolition in error?

**RGU response:** Yes. Only the wood retaining wall along East Island Avenue will be removed. The retaining wall along the railroad (photo one in Exhibit F) will not be removed. The retaining wall along East Island Avenue and Grove Street (photo two) will be removed and replaced.

- (5) **Stormwater runoff, fertilizer, and herbicide use** (Chaffee, Clean Water Alliance, Berg): How much stormwater runoff and fertilizer and herbicide use will there be and how will it be mitigated?

**RGU response:** The response to Question 16 of the EAW describes the level of detail now available about runoff during construction. The level of detail after construction presently available is reported in the response to Question 17 of the EAW. This calculation will be developed prior to City approval of the required Storm Water Management Plan for this site

- (6) **Wildlife on Parcel B and potentially Parcel C** (Kahn, Friends of the Mississippi River, Nelson, Nicollet Island—East Bank Neighborhood Association (NIEBNA), Cagle, Sierra Club, Bulthaus):

**Comments:** Will the change in use affect the Mississippi Flyway? The common species on the site should be inventoried and assured a new home.

**Bulthaus:** “Many of the speakers talked about insect and flower varieties as well as mammals viewed as unique to the Island. I would disagree—rabbits, fox, deer, groundhogs and even eagles are adapted (or adapting) to urban settings as their original habitat disappears and all of these are actually somewhat common in many parts of the metro area. The wildflowers on the Island are indeed scenic, but the species I have observed are not unique or protected—they are the same ones seen along many highways and in abandoned or uncultivated fields or city lots”

**RGU response:** The Natural Heritage and Non-game Research Program was contacted (NHNRP Contact # 20060324-0002). Staff responded that, “based on the nature and location of the proposed project I do not believe it will affect any known occurrences of rare features.” The Mississippi Flyway includes eight Canadian Provinces and sixteen states (including Alaska) before terminating in the Gulf of Mexico. Locally, the Minnesota

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Valley National Wildlife Refuge and the Minnesota Valley State Recreation Area provide 18,000 acres of refuge area close to Minneapolis.

**f) Local review (Chaffee, Durkacs, MHS):**

**Durkacs:** “The draft EAW comments that historic preservation and other plan conformance issues must be addressed later by other governmental bodies. This is wrong. In *Trout Unlimited, Inc. v. Minn. Department of Agriculture*, 528 N.W.2d 903 (Minn. App. 1995), the Minnesota Court of Appeals ruled that future regulatory controls to mitigate impacts cannot be relied on to conclude that an EIS is unnecessary. Instead, environmental impacts of future project phases (such as the tennis courts, historic preservation impacts, etc.) need to be addressed in the EAW to get the facts on the table for a proper review.”

**Minnesota Historical Society:** “Some portions of the EAW (and supporting documents) are not clear on this point and imply a continuing [State Historic Preservation Office] review. It is important that the city understand that this is not the case, and that the city needs to comprehensively address historic preservation issues as part of the local review and approval process.”

**Chaffee:** The Conditional Use process is not an adequate means of addressing the impact of the Project on the Regional Park. The appropriate means of doing so would be an EIS.

**RGU response:** The City can rely on its authority to order whatever additional information might be needed during the permit review process, and it can rely on specific mitigation by its ongoing regulatory authority to eliminate the potential for what might otherwise be significant environmental effects.

The City has the process, authority, competence, and staff to conduct the review and to assure its conditions are fulfilled. The process the City will use to review the Project will be competent and open. In its review of the Project and determination of the required mitigation, modifications, and amendments necessary for approval, the City will have the opportunity to initiate similar studies, have similar information made available, and provide similar opportunities for public participation as would be provided in an EIS process.

The City has the experienced appointed and elected officials and professional staff and regulatory format to address and resolve the technical issues raised by this Project. Its review and decision-making by local elected officials will also provide the most acceptable process to resolve the major non-technical, subjective, and perceptual issues regarding the visual relationships, compatibility with adopted plans and policies, and potential effects likely to be generated by the Project. The record created by this EAW process will be available to inform and guide all participants. This local process and the opportunity for additional public

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participation will ensure the evaluation and mitigation of the potential environmental effects of the Project.

The City of Minneapolis review process for this proposal will have two sequential but interrelated reviews. First, the Minneapolis Heritage Preservation Commission, through its process of staff analysis, public meetings, discussion by informed and experienced appointed commissioners, and, if necessary, by final decision of the City Council, will issue a "Certificate of Appropriateness" for the proposal. Second, the approvals identified in the EAW as necessary for development of the proposal will be reviewed by the City Planning Commission and City Council.

- g) Concession stand** (Christenson, Stellar): This activity was not included in the EAW.

**RGU response:** Noted for the record

- h) Hydrotropic soils and sedge grasses** (Christenson): May be located on Parcel B.

**RGU response:** The significance of these soils and these grasses are as markers of a wetland area. Given the positive drainage from the site and its development history, a viable wetland area is not probable on Parcel B.

- i) Geologic hazards** (Christenson): Potential geological hazard when digging the footings for the light poles.

**RGU response:** It has not been determined whether the footing for the light poles will be drilled or installed as spread footings. The footing design will be accomplished with professional care.

- j) The proposed East Island Ave retaining wall should be better described and its impacts discussed** (NIEBNA, Chaffee):

**RGU response:** No accurate, descriptive illustrations of this retaining wall have been prepared. The applications for the Certificate of Appropriateness to the Heritage Preservation Commission and the Land Use Approvals to the City Planning Commission will provide an illustration and greater detail for the design and plan for the proposed wall.

- k) Home Games** (Stellar): What will be the number of home games?

**RGU response:** The response to Question 6b in the EAW describes the DeLaSalle use of the athletic facility as allowing DeLaSalle to host half of its season games and any potential post season games as home football games, plus practice for those games, on the DeLaSalle campus. During 2005, this would have been a total of 4 home football games. These 4 home varsity football games would be attended by many spectators, would begin at 7pm, and would require the field to be lighted.

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In addition to the varsity football games, the Boys Junior Varsity football team and the Boys 9 football team play games during the season. These games are usually in the early afternoon or on Saturday mornings, do not attract a significant number of spectators, and would not require the field to be lighted. The potential of this additional use by DeLaSalle of the athletic facility is noted for the record.

- l) Park Board use** (Hively, Brazaitis): The EAW describes the DeLaSalle use of the field but not the Park Board's. All potential non-athletic uses of the athletic facility over its life should have been considered in the EAW

**RGU response:** The facility is described as and, if approved, will be permitted as an athletic facility, not an amphitheater or other entertainment venue.

Don Siggelkow, General Manager of Administration, for the Minneapolis Park and Recreation Board described the Park Board's anticipated use as follows:

Utilization for youth soccer and youth football on the athletic field would be primarily showcase events, tournaments and clinics. During the school year, the use would be on Saturdays. During the summer months, it would be daytime/weekday use, primarily for clinics. Many of the events will be done with the kids being transported from recreation centers by van and would have minimal traffic and parking issues. Showcase and tournament activities will typically generate 200-to-300 spectators over the course of the day. We would anticipate 20 Saturday activities and 20 weekday activities with 12-hour blocks of time to accommodate set-up and take-down.

Use of the gymnasium would be similar—youth basketball, youth volleyball, and primarily showcase events, tournaments, and clinics. During the school year, the use would be on Saturdays. During the summer months, it would be daytime/weekday use, primarily for clinics. Many of the events will be done with the kids being transported from recreation centers by van and would have minimal traffic and parking issues. Showcase and tournament activities will typically generate 200-to-300 spectators over the course of the day. We would anticipate 10 Saturday activities and 5 weekday activities with 12-hour blocks of time to accommodate set-up and take-down.

- m) Environmental site assessment** (Viken, Brazaitis): In spite of what the EAW asserts, there is no evidence of an environmental site assessment being completed.

**RGU response:** A Phase I environmental site assessment will likely be completed prior to the start of the Project.

## **V. ISSUES IDENTIFIED IN THE EAW**

The EAW identified the following potential environmental effects of the Project:

1. **Physical impacts:** The design and operation of the Project, especially the impacts of noise and lighting, have the potential to adversely affect the nearby residential uses.
2. **Historic impacts:** The Project will have adverse effects on the historic resources in the St. Anthony Falls Historic District.
3. **Conformance with plans:** Several adopted plans apply to the Project with policies that might be interpreted as being supportive of the Project and others that might be interpreted as indicating inconsistency.

## **VI. COMPARISON OF POTENTIAL IMPACTS WITH EVALUATION CRITERIA**

In deciding whether a project has the potential for significant environmental effects and whether an Environmental Impact Statement (EIS) is needed, the Minnesota Environmental Quality Board rules (4410.1700 Subp. 6 & 7) require the responsible governmental unit, the City in this case, to compare the impacts that may be reasonably expected to occur from the Project with four criteria by which potential impacts must be evaluated. The following is that comparison:

### **A. Type, Extent, and Reversibility of Environmental Effects**

1. **Physical impacts:** The design and operation of the Project, especially the impacts of noise and lighting, have the potential to adversely affect the nearby residential uses. The noise analysis concluded that no significant adverse noise impacts are anticipated from the proposed athletic facility, including traffic noise. Park Board activities on the athletic field would not require lighting, however, the 4 home varsity football games would begin at 7 p.m. and would require the field to be lighted. The glare from the proposed field lighting will be visible off site and an intrusion on the view of the downtown skyline in the vicinity of the Project site. To mitigate this potential impact, the proposer has committed to using the best available technology to focus light onto the field and minimize light spill to attain a standard of no more than 1 foot-candle outside Project limits.
2. **Historic impacts:** The Project will have an effect on the historic resources in the St. Anthony Falls Historic District. The analysis prepared for this EAW concluded the following:
  - The proposed new construction does not appear to have an impact on the following historic resources in the area: Grove Street Flats, the Nicollet Island Residential Area, and the St. Paul and Northern Pacific Railroad.

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- The proposed vacation and demolition of a portion of Grove Street will constitute an adverse impact on the historic district.

**3. Conformance with plans:** Several adopted plans apply to the Project with policies that might be interpreted as being supportive of the Project and others that might be interpreted as indicating inconsistency. It will be up to the City's various decision-making bodies during the Project review process to determine Project consistency with these plans and policies and with the other applicable City ordinances and processes. For example, the Minneapolis Planning Commission will review the Project for consistency with the City's Comprehensive Plan and the Zoning Code. The Minneapolis Heritage Preservation Commission will review the Project and the proposed street demolition and vacation per the guidelines of the historic district. With the advice of the Public Works and Planning departments, the City Council will have final approval authority over the vacation of Grove St. Further, these issues will be addressed by the actions of Minneapolis Park and Recreation Board and the Metropolitan Council.

**B. Cumulative Effects of Related or Anticipated Future Projects**

The EAW has described the potential environmental effects of the Project. At this time, the Project includes no known connected or phased aspects of the Project that were not included in the EAW. The EAW included all anticipated cumulative effects of the Project.

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

The City has discretionary authority through its land use approval process and through the HPC's approval process; and the City, the Minneapolis Park and Recreation Board, and the State have ministerial authority through the permit approvals required for this project to address, mitigate, or avoid the environmental effects identified in the EAW and the comments (refer also to the response to Part A above).

**D. Extent to which Environmental Effects Can be Anticipated and Controlled as a Result of other Environmental Studies Undertaken by Public Agencies or the Project Proposer, or of Environmental Reviews Previously Prepared on Similar Projects.**

The construction of an athletic facility follows many precedents and is a known event with known effects.

**VII. DECISION ON THE NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT**

Based on the Environmental Assessment Worksheet, the "Findings of Fact and Record of Decision," and related documentation in the public record for the DeLaSalle High School Athletic Facility Project (Project), the City of Minneapolis concluded the following on December 23, 2005:

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

1. The Environmental Assessment Worksheet, the “Findings of Fact and Record of Decision Document,” and related documentation in the public record for the Project were prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minn. Rules, Parts 4410.1000 to 4410.1700 (1993).
2. The Environmental Assessment Worksheet, the “Findings of Fact and Record of Decision Document,” and related documentation in the public record for the Project have satisfactorily addressed all of the issues for which existing information could have been reasonably obtained.
3. The Project does not have the potential for significant environmental effects based upon the findings in the “Findings of Fact and Record of Decision Document” and the evaluation of the following four criteria (per Minn. Rules, Parts 4410.1700 Subp. 7):
  - Type, extent, and reversibility of environmental effects.
  - Cumulative effects of related or anticipated future projects.
  - Extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.
  - Extent to which environmental effects can be anticipated and controlled as a result of other environmental studies undertaken by public agencies or the Project proposer, or of environmental reviews previously prepared on similar projects.
4. The finding by the City that the EAW is adequate and no EIS is required provides no endorsement, approval, or right to develop the proposal by the City and cannot be relied upon as an indication of such approval. This finding allows the proposer to initiate the City’s process for considering the specific discretionary and ministerial permissions necessary for the Project, and for the City in this process, informed by the record of the EAW, to identify and mitigate any potential adverse environmental effects potentially associated with the Project. Consequently, the City does not require the development of an Environmental Impact Statement for the Project.

**Final action:** Refer to Exhibit I.

**Exhibits:**

- A. Project Description
- B. Record of Decision
- C. Public Notification Record
- D. Written Comments
- E. Public Comment Meeting
- F. Photos of retaining walls and lighting plan
- G. Preliminary Site Plan Presentation, Community Advisory Committee, 9/13/05
- H. Project renderings
- I. Council/Mayor action

## **EXHIBIT A**

### **Project Description**

The project (Project) is an addition of a regulation size football field at the DeLaSalle High School campus on Nicollet Island (refer to Attachment C, Site Plan in the EAW). The field will be shared by DeLaSalle High School and the Minneapolis Park and Recreation Board (MPRB) under the terms of a Reciprocal Use Agreement (Attachment F in the EAW). The new athletic facility will allow DeLaSalle to host half of its season games and any potential post season games as home football games, and practice for those games, on the DeLaSalle campus. During 2005, this would have been a total of 4 home football games. The new field will also provide one regulation size soccer field and three junior soccer fields for shared use of the new football and soccer facilities by the MPRB. The proposed Reciprocal Use Agreement will also provide the MPRB with access to DeLaSalle's indoor athletic facilities for their youth sports and recreation programs.

The athletic field will be built on two adjacent parcels of land and a portion of the existing Grove Street right-of-way between Nicollet Street and East Island Avenue, which will have to be vacated for the Project (refer to Attachment B, Site Context in the EAW). In addition to a portion of the existing Grove Street right-of-way between Nicollet Street and East Island Avenue, which will have to be vacated for the Project, the parcels are as follows:

- Parcel A: The present DeLaSalle practice field and adjacent warm-up areas.
- Parcel B: The parcel between Grove Street and the Railroad, Nicollet Street and E Island Ave. This parcel is owned by the MPRB and includes three tennis courts and a sloped grassy area.
- Parcel C: The present parking lot area proposed to be improved by DeLaSalle between East Island Avenue and the Mississippi River channel. The parking lot is and will remain owned and controlled exclusively by the MPRB.

DeLaSalle will develop the athletic facility at its expense in cooperation with the MPRB. New construction will consist primarily of site work for the sand-based football/soccer field with minimum dimensions of 200 ft. wide and 390 ft. long. The field is proposed to be natural grass, but pervious artificial turf may be considered for durability. Site work will include grading and installing the new athletic field, walking paths, landscaping and low-level path lighting, and installing decorative masonry or stone retaining walls. On the north, east, and south edges of the site, a four-foot-tall decorative fence will be installed along top of the retaining walls for safety and to contain errant balls. Goal posts and four 70-ft.-tall poles for lights and poles for loudspeakers adjacent to the press box will be placed on the site (refer to Attachment C, Site Plan in the EAW). The sole building construction will be the structure for the 750-seat bleachers, an enclosed press box, and storage facilities located under the seating (refer to Attachment D, Project Elevations in the EAW). Exterior materials for the bleacher structure have not been determined but will be chosen for compatibility with the character of the Island and will be subject to approval by the Minneapolis Heritage Preservation Committee.

Off-street parking for spectators will be provided in the present school parking lots, providing 166 spaces. An additional 65 spaces of public off-street parking may be available for use in the parking

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area between East Island Avenue and the River (Parcel C). This existing parking lot is generally open to the public and provides over-flow capacity for public and private events at the Nicollet Island Inn, the Amphitheater and Pavilion on the Island, and at DeLaSalle High School. The improvements proposed by DeLaSalle to this lot consist of replacing the impervious gravel surface with porous pavers and allowing more efficient use of the parking area by organizing and delineating the parking spaces on the site. The more efficient use of the site will increase its capacity to 87 cars. It is expected the MPRB will continue to keep the parking area open to the public.

Depending on the process of public review and approvals, grading of the site and seeding of the field could begin next summer. The bleachers and other improvements could be installed in the late summer or fall of 2006, or the spring or summer of 2007, with the Project ready for use in the fall of 2007. The performance grass used for the football field requires a complete growing season before it is ready for use.

**EXHIBIT B**

**Environmental Review Record for the DeLaSalle High School Athletic Facility  
Environmental Assessment Worksheet**

**CHRONOLOGY IN COMPLIANCE WITH THE PROCEDURES OF THE MINNESOTA  
ENVIRONMENTAL POLICY ACT**

<b><u>DATE</u></b>	<b><u>ITEM</u></b>
9/2/05	City orders the preparation of an EAW for the Project
10/21/05	City staff distributes EAW to official EQB mailing list and DeLaSalle Project List.
10/24//05	Minnesota Environmental Quality Board (EQB) publishes notice of availability in <i>EQB Monitor</i> . 30-day comment period commences.
11/15/05	Public Comment Meeting held at DeLaSalle High School.
11/23/05	End of EAW public comment period.
12/15/05	Zoning and Planning Committee (Z & P) of the City Council considers the "Findings of Fact and Record of Decision Document" and provides recommendation to the City Council: EAW is adequate and no EIS is necessary.
12/23/05	City Council approves Z & P Committee recommendation and makes a finding of Negative Declaration: EAW is adequate and no EIS is necessary.
12/29/05	Mayor approves Council action regarding EAW
12/31/05	City publishes notice of Council/Mayor decision in Finance and Commerce. Moratorium on issuance of final permits lifted.
1/17/06	City publishes and distributes Notice of Decision and availability of final "Findings" report to Official EQB List and the Official Project List
1/30/06	EQB publishes Notice of Decision in <i>EQB Monitor</i> .

## **EXHIBIT C**

### **Public Notification Record**

The following describes the public notification process of the Planning Division for the DeLaSalle High School Athletic Facility EAW:

1. The Planning Division maintains an updated list based on the Official EQB Contact List. The Planning Division also distributed copies of the EAW and related documents via interoffice mail to elected and appointed officials, City staff, and others who have expressed interest in the Project.
2. The Planning Division developed a DeLaSalle Official Project List. The list included the following names:
  - Everyone who inquired about the project.
  - Everyone who submitted information or comments on the project.
  - Everyone who signed in at the Public Comment Meeting.
3. The Planning Division notified the people and agencies on the then-current DeLaSalle Official Project List and the Official EQB Contact List regarding the availability of the EAW, the draft and final “Findings of Fact and Record of Decision Document,” and the Notice of Decision. The notification materials included information regarding EAW/RGU Contact Person, the dates of the public comment period and the Public Comment Meeting, methods to obtain more information and submit comments, and the likely dates of the decision-making process for the EAW.
4. The Planning Division provided paper copies of the Findings of Fact and Record of Decision and the EAW to the downtown Minneapolis Public Library located at 250 Marquette Ave. and to the Southeast Community Library located at 1222 SE 4th St. The Planning Division emailed the Findings report to the representatives of all of the parties that requested the City to order the preparation of the EAW and provided paper copies and a compact disk of the reports to all who requested them.
5. The Planning Division posted the following documents as they became available on the City of Minneapolis web site (<http://www.ci.minneapolis.mn.us/planning>):
  - DeLaSalle Athletic Facilities EAW
  - Documents Included by Reference in the DeLaSalle Athletic Facilities EAW
  - Findings of Fact and Record of Decision Document for the DeLaSalle Athletic Facilities EAW
  - Notice of Decision for the DeLaSalle Athletic Facilities EAW
6. The EQB published the notice of availability of the EAW in the *EQB Monitor* on October 24, 2005; and the Planning Division provided the notice of availability of the EAW in the form of a press release to the *StarTribune* newspaper on October 17, 2005.

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

5. On 1/16/06, the Planning Division distributed the Notice of Decision and the notice of availability of the final “Findings of Fact and Record of Decision Document” to the people and agencies on the DeLaSalle Official Project List and the Official EQB Contact List.

**Attached:**

Official EQB Contact List

DeLaSalle Official Project List

State EQB List Updated: 11-2-05

Lois Eberhart  
Interagency Coordinator, Public Works  
203 City Hall  
Interoffice

Jeremy Stratton  
Skyway News  
1115 Hennepin Ave. S.  
Minneapolis MN 55403

Jim Haertel  
Board of Water & Soil Resources  
520 Lafayette Rd.  
St. Paul MN 55155

Jason Wittenberg  
Interoffice  
300 PSC

Minneapolis Public Library (2)  
Technology and Science  
250 Marquette Ave  
Minneapolis MN 55401

Corey Conover  
City Attorney  
300 Metropolitan Center  
Interoffice

Carol Blackburn  
Legislative Reference Library  
645 State Office Building  
St. Paul MN 55155

Tamara Cameron  
U.S. Army Corp of Engineers  
190 Fifth Street E.  
St. Paul MN 55101

Becky Balk  
Department of Agriculture  
90 W. Plato Blvd.  
St. Paul MN 55107

Reviews Coordinator (5)  
Metropolitan Council  
230 E. Fifth Street  
St. Paul MN 55101

Kenneth Westlake  
U.S. Environ. Protection Agency  
77 W. Jackson Blvd. Mailstop B-14  
Chicago IL 60604-3590

Marya White  
Department of Commerce  
85 7th Place East, Suite 500  
St. Paul MN 55101

Dennis Gimmestad  
Minnesota Historical Society  
345 Kellogg Blvd.  
St. Paul MN 55102

T.C. Field Office ES  
U.S. Fish & Wildlife Service  
4101 E. 80th Street  
Bloomington MN 55425-1665

Environ. Health Division  
Department of Health  
121 E. Seventh Place, Suite 230  
St. Paul MN 55101

Beth Lockwood (3)  
MN Pollution Control Agency  
520 Lafayette Road  
St. Paul MN 55155

Development Review Coordinator  
Mn/Dot - Metro Division (3)  
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1500 West County Road B-2  
Roseville MN 55113

Thomas Balcom (3)  
Department of Natural Resources  
500 Lafayette Road  
St. Paul MN 55155-4010

Gerald Larson  
MnDOT Environmental Services  
395 John Ireland Blvd MS620  
St. Paul MN 55155

Jon Larsen  
Environmental Quality Board  
658 Cedar St., #300  
St. Paul MN 55155

Stewardship Team Manager  
National Park Service  
111 East Kellogg Blvd, Suite 105  
St. Paul MN 55101-1288

Dave Jaeger  
Henn. Co. Environmental Services  
417 N. 5th Street  
Minneapolis MN 55401

Jon Wertjes  
Public Works  
233 City Hall  
Interoffice

Ann Calvert CPED – 200 CRM	Becca Farrar	P. Victor Grambsch, Chair NIEBNA 132 Bank St Minneapolis, MN 55414
Council Member Natalie Johnson Lee	Amy or Greg (HPC)	Eric H. Galatz 150 South Fifth St Suite 23C Minneapolis, MN 55403
Council Member Don Samuels	Barbara Sporlein	Phyllis & Donald Kahn 115 West Island Ave. Minneapolis, MN 55401
Jason Wittenberg	Judd Rietkerk Minneapolis Park & Recreation Board 2117 West River Road Minneapolis, MN 55411-2227	Thomas & Mary Rose 91 Nicollet St. Minneapolis, MN 55401
Michael Orange	Mary & Jamaica Nadeau 97 Nicollet St. Minneapolis, MN 55401	Joyce Vincent 38 7th Avenue NE Minneapolis, MN 55413
Beth Greffin 701 Ramsey St. Minneapolis, MN 55413	D'Nardo & Julie Colucci 27 Maple St. Minneapolis, MN 55401	David Topper 4201 Grand Avenue Minneapolis, MN 55409
Kevin Upton 217 Bank St. Minneapolis, MN 55414	Nancy McKinley 1330 N. Avon St. St. Paul, MN 55117	Deb Zwickey 209 12th Avenue NE Minneapolis, MN 55413
Carol Brant 110 Bank Street Minneapolis, MN 55414	Marian Jacobson 4358 4th Avenue S Minneapolis, MN 55409	Eileen Stewart 4328 11th Avenue NE Minneapolis, MN 55407
Steve Christenson 171 E Island Avenue Minneapolis, MN 55401	Arlene Fried 1109 Xerxes Ave. S. Minneapolis, MN 55405	Katharine Simon-Dastych 2809 42nd Avenue S Minneapolis, MN 55406
Elizabeth Wielinski 3519 2nd St. NE Minneapolis, MN 55418	LuAnn Wilcox 20 Grove St. Minneapolis, MN 55401	Janet Deming 186 E Island Ave. Minneapolis, MN 55401

Sally Cagle  
12A Grove St.  
Minneapolis, MN 55401

Judy Blaseg  
4236 Linden Hills Blvd.  
Minneapolis, MN 55410

Barry Clegg  
Rider Bennet, LLP  
33 South Sixth St. Ste. 490  
Minneapolis, MN 55402

Bert McKasy  
4200 IDS Center – 80 South Eight  
Street  
Minneapolis, MN 55402

Theodore Wirth  
2504 West 40th Street  
Minneapolis, MN 55410

Ryan Curry  
127 NE 5th Street #109  
Minneapolis, MN 55413

Edna Brazaitis  
4A Grove Street  
Minneapolis, MN 55401

Jeffrey T Lee  
3620 11th Avenue South  
Minneapolis, MN 55407

Ken Shaffer  
901 Summer Street NE  
Minneapolis, Mn 55413

Thomas Hoch  
601 Madison Street NE  
Minneapolis, MN 55401

Rip Rapson  
419 5th Street SE  
Minneapolis, MN 55414

Mary Jane Partyka  
Elder-Main Street Lodge  
909 Main Street NE  
Minneapolis, MN 55413

Neva Walker  
3740 3rd Avenue South  
Minneapolis, MN 55409

Susan Howitz Hanna  
2015 19th Avenue NE  
Minneapolis, MN 55418

J. D. Pride  
77 7th Avenue NE  
Minneapolis, MN 55413

Chris Johnson  
2420 West 54th Street  
Minneapolis, MN 55410

Roger Cummings  
15A Maple Place  
Minneapolis, MN 55401

Todd Roeder  
44 8th Avenue NE  
Minneapolis, MN 55413

Jim Nestingen  
3749 47th Avenue South  
Minneapolis, MN 55406

John Pacheco  
800 Nicollet Mall 29th Floor  
Minneapolis, MN 55402

John Chafee  
163 Nicollet Street  
Minneapolis, MN 55401

Judy Richardson  
163 Nicollet Street  
Minneapolis, MN 55401

Prudence Johnson  
113 West Island Avenue  
Minneapolis, MN 55401

Deanna Cummings  
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Minneapolis, MN 55401

Jim Surdyk  
303 East Hennepin Avenue  
Minneapolis, MN 55414

Scott Neiman  
5705 Wentworth Avenue  
Minneapolis, MN 55419

Thomas Johnson  
5501 Irving Avenue South  
Minneapolis, MN 55410

Michael O'Keefe  
DeLaSalle High School  
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Minneapolis, MN 55401

Michael Cronin  
8809 W. Bush Lake Road  
Minneapolis, MN 55438

Spencer Arndt  
80 NE 44 Ave.  
Minneapolis, MN 55421

Linda Schutz  
1523 W. 22 St.  
Minneapolis, MN 55405

Erzo Luttmmer  
8A Grove St.  
Minneapolis, MN 55401

Bob Roscoe  
1401 E. River Pkwy  
Minneapolis, MN 55414

John Crippen  
Mill City Museum  
704 S. 2nd St.  
Minneapolis, MN 55401

Chris Stellar  
95 W. Island Ave.  
Minneapolis, MN 55401

P. Felicetta  
2311 Roosevelt St NE  
Minneapolis, MN 55418

Patrick Scully  
167 Nicollet St.  
Minneapolis, MN 55401

Susan Hoch  
2210 24th Ave S  
Minneapolis, MN 55406

Janet Hively  
93 Nicollet St  
Minneapolis, MN 55401

Judy Blaseg  
4236 Linden Hills Blvd  
Minneapolis, MN 55410

Judith May  
10A Grove St  
Minneapolis, MN 55401

Terri Keenan  
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Minneapolis, MN 55401

Lawrence Romanko  
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Minneapolis, MN 55430

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Minneapolis, MN 55401

Stephanie Gozum  
14A Grove St.  
Minneapolis, MN 55401

Nikki Carlson  
4035 Sheridan Ave S  
Minneapolis, MN 55410

Michael & Darcel Rainville  
89 7th Ave N E  
Minneapolis, MN 55413

Gabriel Satoskar  
14A Grove St.  
Minneapolis, MN 55401

Brian and Nan Johnson  
5244 Abbott Ave. S.  
Minneapolis, MN 55410

Katie Dastych  
2809 42nd Ave S  
Minneapolis, MN 55406

Christine Viken  
1900 Lasalle Ave  
Minneapolis, MN 55403

Joe Keenan  
6A Grove St.  
Minneapolis, MN 55401

Sidney & Lola Berg  
175 Island Ave E  
Minneapolis, MN 55401

Brien Link  
107 Island Ave W Uppe  
Minneapolis, MN 55401

Nan and Mark Carlson  
6B Grove St.  
Minneapolis, MN 55401

Timothy Keane  
5336 3rd Ave S  
Minneapolis, MN 55419

Elizabeth & Peter Belfio  
9 Fourth Ave. N #102  
Minneapolis, MN 55401

Caroline Lebedoff  
177 Nicollet St.  
Minneapolis, MN 55401

Andy Schneider  
3845 Edgewood Ave. N.  
Crystal, MN 55427

Lynn Leifried  
BNSF Railway Compan  
80 44th Avenue N  
Minneapolis, MN 55421

Erin Jordahl-Redlin  
Clean Water Action Alliance  
308 E. Hennepin Ave.  
Minneapolis, MN 55414

Linda Sheran  
2nd Street NE #611  
Minneapolis, MN 55413

Judith Martin  
University of Minnesota  
Urban Studies Program  
348 Social Sciences  
Minneapolis, MN 55455

Matthew Dreon  
150 2nd Street NE #111  
Minneapolis, MN 55413

Roger Randall  
Preservation Alliance of Minnesota  
75 West Fifth Street - Suite 219  
St. Paul, MN 55102

Robert Mack  
400 S. 4th Street  
Minneapolis, MN 55415

Dorian Grilley  
Parks and Trails Council of Minnesota  
275 E. Fourth St. #642  
St. Paul, MN 55101

Mary Bulthaus  
3309 Edmund St. NE  
Minneapolis, MN 55418

Irene Jones  
Friends of the Mississippi River  
46 E. Fourth Street - Suite 606  
St. Paul, MN 55101

Lisa Hondros  
171 E. Island Ave.  
Minneapolis, MN 55401

Sandy Daly  
167 E. Island Ave.  
Minneapolis, MN 55401

Katie & Rick Fournier  
912 18th Ave. SE  
Minneapolis, MN 55414

Christine Larsen  
2832 W. 40th St.  
Minneapolis, MN 55410

Clareyse Nelson  
601 Adams St. NE  
Minneapolis, MN 55413

Sierra Club  
2327 E. Franklin Ave.  
Minneapolis, MN 55406

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet  
for the DeLaSalle High School Athletic Facility Project**

**EXHIBIT D**

**Written Comments Received Regarding the DeLaSalle Athletic Facilities EAW**

**Federal Agencies:**

1. US Department of the Interior,  
National Park Service

**State and Metropolitan Agencies:**

2. Metropolitan Council
3. Minnesota Department of Natural  
Resources
4. Minnesota Historical Society
5. Minnesota Pollution Control Agency
6. Minnesota Department of  
Transportation

**Organizations and Corporations:**

7. BNSF Railway
8. Clean Water Action
9. Friends of the Mississippi River
10. MacDonald & Mack Architects
11. Nicollet Island-East Bank  
Neighborhood Association
12. Preservation Alliance of Minnesota
13. Parks and Trails Council of Minnesota
14. Sierra Club

**Individuals:**

15. Bartl, Judy
16. Belfiore, Betty
17. Berg, Sid and Lola
18. Bulthaus, Mary
19. Cagle, Sally
20. Carlson, Nan
21. Chaffee, John
22. Christenson, Steven
23. Daly, Sandy
24. Dreon, Mathew
25. Durkacs, Suzanne
26. Fried, Arlene
27. Fournier, Katie
28. Grilley, Margie
29. Hively, Jan
30. Hondros, Lisa C.
31. Johnson, Gary

32. Kahn, Phyllis
33. Larsen, Christine
34. Martin, Judith
35. Nelson, Clareyse
36. Richardson, Judith
37. Roscoe, Robert (11/15/05)
38. Roscoe, Robert (7/25/05)
39. Rose, Thomas
40. Sheran, Linda
41. Stellar, Chris
42. Viken, Christine (11/17/05)
43. Viken, Christine (11/23/05)
44. Willcütt, Peter Johann

**Comments Received After the Close of the  
Public Comment Period (11/23/05)**

45. Brazaitis, Edna (12/2/05, 12/5/05, and  
12/7/05)
46. Vincent, Joyce (12/1/05)
47. Christenson, Steven (12/6/05)
48. Emails from Eric Galatz (12/14/05)  
and Christine Viken (12/12/05)
49. Sally Cagle (12/7/05)
50. Briggs and Morgan (12/15/05)
51. Robert Roscoe (12/15/05)
52. Judith Martin (email dated 12/21/05)
53. Mike Spack (12/7/05)



## United States Department of the Interior

NATIONAL PARK SERVICE  
Mississippi National River and Recreation Area  
111 E. Kellogg Blvd., Ste. 105  
St. Paul, Minnesota 55101-1256

IN REPLY REFER TO:

L8017(MISS)-3

November 23, 2005

J. Michael Orange  
Principal Planner  
Minneapolis Planning Division  
Community Planning and Economic Development  
City Hall, Room 210  
350 South Fifth Street  
Minneapolis, MN 55415-1385

Dear Mr. Orange:

This letter contains comments from the National Park Service (NPS) on the Environmental Assessment Worksheet (EAW) for the proposed DeLaSalle High School Athletic Facility Project. As indicated in the EAW, the entire project area, including all of Nicollet Island, the Mississippi River, and adjacent upland areas in the vicinity of the proposed project, is located within the Mississippi National River and Recreation Area (MNRRA), a unit of the national park system. The MNRRA was established by Congress in 1988 to protect, preserve, and enhance the significant values of the Mississippi River corridor through the Twin Cities metropolitan area. As also identified in the EAW, a Comprehensive Management Plan (CMP) for the MNRRA was approved in 1995. The CMP provides a policy framework for the coordinated efforts of federal, state, and local authorities, as well as the general public, to protect and interpret the nationally significant resources of the corridor and for analyzing plans and individual actions in the area. In our review of the EAW, we find the project inconsistent with several key MNRRA CMP policies and guidelines:

1) The proposed athletic complex is not in keeping with the CMP's general criteria for compatible riverfront uses. The CMP gives special emphasis to protection of areas along the riverfront due to the high concentration of significant natural, cultural, and economic resources, its potential for outdoor recreation, and a greater probability for serious adverse effects if not properly managed. It is our belief that the proposal does not demonstrate a clear need for a riverfront location; that is to say, the proposed facility is not reliant upon the river, a riverfront location, or a connection to the river for its operational needs or economic benefit. There also seems to be significant potential for conflict with established uses—particularly those of a more quiet and passive nature—on Nicollet Island and other areas within the Saint Anthony Falls Historic District, as well as potential inconsistencies with the character of nearby residential neighborhoods and components of the adjacent regional park system on, and adjacent to, the

island. Further, we expect the proposed project would result in some loss of visual open space, and would interfere with some river views.

2) The proposal is not consistent with CMP goals that stress the preservation of public open space. Open space is a critical resource in the river corridor and its protection and enhancement is stressed in the CMP. The proposal calls for the elimination of existing public open space on land owned by the Minneapolis Park and Recreation Board for the sole benefit of a narrow group of potential users. Such loss of open space is not supported in the plan.

3) The proposal is inconsistent with the historic preservation goals of the CMP. One of the principal purposes for which Congress established the MNRRA was to preserve, enhance and interpret its archeological, ethnographic, and historic resources. Of all the places that convinced Congress to establish MNRRA, the St. Anthony Falls Historic District is one of the most important.

No place anchors the metro Mississippi River's historical significance like St. Anthony Falls. Geologically, it is unique; St. Anthony Falls is the only major waterfall on the Mississippi River. According to Dakota tradition, the falls are home to Oanktehi, the spirit of waters and underworld. For the Dakota, Nicollet Island was once an important place for harvesting maple syrup. Historically, visitors to the falls comprise a who's who of European and American exploration: French explorer Father Louis Hennepin, English colonist Jonathan Carver, and Zebulon Pike, the first American explorer to portage around the falls 200 years ago. Its painters include George Catlin, Henry Lewis, Alexis Fournier, and Albert Bierstadt.

Economically, the falls created a city with no peer west of Chicago to the Rocky Mountains and south to St. Louis. It gave birth to the saw milling and flour milling industries that became the leading producers of their commodities in the United States and, at times, the world. For some 50 years Minneapolis was the nation's flour capital. Technologically, the falls produced the first commercial hydroelectric central plant in the United States. The St. Anthony Falls area boasts two National Historic Landmarks: the Pillsbury A Mill and the Washburn A Mill. They bookend James J. Hill's remarkable stone arch bridge, which is a National Engineering Landmark.

For all the above reasons, the greater St. Anthony Falls area is a National Register of Historic Places District. Resting at the tip of the St. Anthony Falls horseshoe dam, Nicollet Island lies near the heart of all of this history. What happens here affects all that surrounds it.

The proposed DeLaSalle Stadium development would adversely affect the St. Anthony Falls Historic District in a number of ways. Grove Street is one of the physical anchors that define the historic setting of Nicollet Island. Its presence on the island since the late 1860s grounds us in how historic events developed along and around it. Grove Street is one of the few through streets on the island, running from one side of the island to the other. As such, it is a defining feature of the island's landscape which helps to interpret important aspects of the island's history. It does not require buildings lining the eastern end to serve this purpose.

As designed, the project would have additional adverse effects beyond destroying a large section of Grove Street. The design calls for bleachers to be built across the road alignment. This would

present a serious visual obstruction to what was once a clear line of sight down the road, destroying the visual role the road played as one of the through streets on the island.

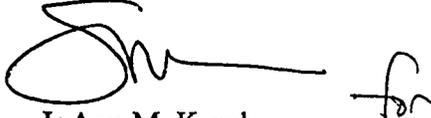
The proposed high mast lighting would also adversely affect the historic district, particularly since the island has 360 degree visibility. The structures and stadium lights would be out of character with the historic district and would be visible from all directions.

Finally, the archeological report completed by Dr. Michelle Terrell demonstrates that a high potential for archeological sites exists in some areas of the proposed project. If National Register eligible sites exist in the project area, they could be adversely affected by the project. Given the benefits of the stadium project stated in the EAW, we believe those benefits simply do not justify the adverse effects on the St. Anthony Falls Historic District. The District is significant at the local, state, and national levels and the project would only benefit a relatively small, local group of users.

In conclusion, though we recognize that the proposed facility would be a convenience for the operation of the DeLaSalle High School athletics program and could help the Minneapolis Park and Recreation Board in meeting some of its program needs, the proposal nonetheless is inconsistent with riverfront location guidelines, open space protection goals, and historic preservation purposes identified in the MNRRA CMP. In accordance with the CMP, new activities that do not need a river location, that do not contribute to the riverfront environment, or that would cause some environmental degradation or have some other detrimental effects on corridor resources, should be located outside the riverfront area. We recommend that other alternatives be more seriously evaluated to meet the proposers' needs, including an alternate location for a new stadium complex in a less sensitive area, or use of existing facilities. If the project is approved where proposed and the proposers elect to proceed, we strongly recommend that an unlighted stadium design be implemented. We also recommend that an archeological survey and evaluation be completed before a final decision on the stadium project is made.

Thank you for the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the proposed DeLaSalle High School Athletic Facility Project. If you have any questions concerning our comments please contact me or Jim Von Haden at 651-290-3030, ext. 235.

Sincerely,



JoAnn M. Kyral  
Superintendent

cc:

Brother Michael Collins, DeLaSalle High School  
Minneapolis Park and Recreation Board  
Dennis Gimmestad, Minnesota Historical Society  
Greg Mathis, Minneapolis Heritage Preservation Commission

November 15, 2005

Michael Orange, Principal Planner  
Minneapolis CPED - Planning  
210 City Hall,  
350 South 5<sup>th</sup> Street  
Minneapolis, MN 55415

RE: Minneapolis-- Environmental Assessment Worksheet (EAW) – DeLaSalle Athletic Facility  
Metropolitan Council District 7 (Annette Meeks, 612-341-8168)  
Metropolitan Council Review File No. 19599-1

Dear Mr. Orange:

The project proposes the construction of the De La Salle High School Athletic Facility on Nicollet Island in Minneapolis. The Metropolitan Council staff review finds that the EAW is complete and accurate with respect to regional concerns and raises no major issues of consistency with Council policies. An EIS is not necessary for regional purposes. However, staff offers the following comments for your consideration.

***Item 6 – Project Description***

The document states on page 4 that parking lot improvements proposed by DeLaSalle to an existing off-street parking area (Parcel C) consist of replacing the impervious gravel surface with porous pavers. However, it would appear from language in the document's Attachment F that the same "auxiliary parking lot" is to be reconstructed with a bituminous surface. The final Response to Comments document needs to clarify this apparent inconsistency.

***Item 17 – Water Quality – Surface Water Runoff***

As proposed, the project would most likely result in an increase in surface water runoff to the Mississippi River. While some impervious surface will be eliminated, an extensive drain tile system is proposed to be installed beneath the playing field. All site irrigation and rainfall would be expected to infiltrate into the tile system and be routed to the City's existing storm water system. The Council recommends the incorporation of Low Impact Development (LID) techniques like rainwater gardens and infiltration trenches through which this flow could first be routed, to help reduce surface water runoff volumes and rates (to the Mississippi River) to the degree possible. The Metropolitan Council's *Urban Small Sites BMP Manual* includes detailed information on 40 best management practices that make sense in an urban small-site, cold-climate setting. The manual is available at: <http://www.metrocouncil.org/environment/Watershed/BMP/manual.htm>.

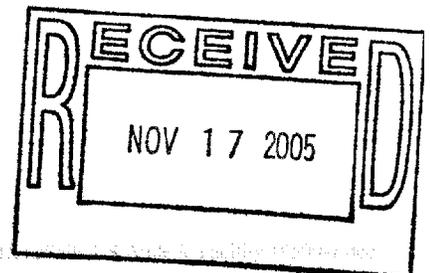
If you have any questions or need further information, please contact Jim Uttley, AICP, principal reviewer at 651 602-1361.

Sincerely,



Phyllis Hanson, Manager  
Local Planning Assistance

cc: Michael O'Keefe, Vice President for Planning, DeLaSalle High School  
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division  
Annette Meeks, Metropolitan Council District 7  
Keith Buttleman, Environmental Services  
Denise Engen, Sector Representative  
Jim Uttley, Principal Reviewer  
Cheryl Olsen, Reviews Coordinator





# Minnesota Department of Natural Resources

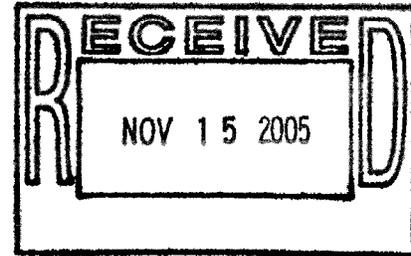
Natural Heritage and Nongame Research Program, Box 25  
500 Lafayette Road

St. Paul, Minnesota 55155-40 ....

Phone: (651) 259-5107 Fax: (651) 296-1811 E-mail: sarah.hoffmann@dnr.state.mn.us

November 9, 2005

Mr. Michael Orange  
City of Minneapolis Planning & Economic Development  
Room 210 City Hall  
350 South 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385



Re: Request for Natural Heritage information for vicinity of proposed DeLaSalle High School Athletic Facility,  
T29N R24W Section 23, Hennepin County  
NHNR Contact #: ERDB 20060324-0002

Dear Mr. Orange,

The Minnesota Natural Heritage database has been reviewed to determine if any rare plant or animal species or other significant natural features are known to occur within an approximate one-mile radius of the area indicated on the map enclosed with your information request. Based on this review, there are 7 known occurrences of rare species in the area searched (for details, see enclosed database printout and explanation of selected fields). However, based on the nature and location of the proposed project I do not believe it will affect any known occurrences of rare features.

The Natural Heritage database is maintained by the Natural Heritage and Nongame Research Program, a unit within the Division of Ecological Services, Department of Natural Resources. It is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. Its purpose is to foster better understanding and protection of these features.

Because our information is not based on a comprehensive inventory, there may be rare or otherwise significant natural features in the state that are not represented in the database. A county-by-county survey of rare natural features is now underway, and has been completed for Hennepin County. Our information about native plant communities is, therefore, quite thorough for that county. However, because survey work for rare plants and animals is less exhaustive, and because there has not been an on-site survey of all areas of the county, ecologically significant features for which we have no records may exist on the project area.

The enclosed results of the database search are provided in two formats: index and full record. To control the release of locational information, which might result in the damage or destruction of a rare element, both printout formats are copyrighted.

The index provides rare feature locations only to the nearest section, and may be reprinted, unaltered, in an Environmental Assessment Worksheet, municipal natural resource plan, or report compiled by your company for the project listed above. If you wish to reproduce the index for any other purpose, please contact me to request written permission. **The full-record printout includes more detailed locational information, and is for your personal use only. If you wish to reprint the full-record printouts for any purpose, please contact me to request written permission.**

Please be aware that review by the Natural Heritage and Nongame Research Program focuses only on *rare natural features*. It does not constitute review or approval by the Department of Natural Resources as a whole. If you require further information on the environmental review process for other natural resource-related issues, you may contact your Regional Environmental Assessment Ecologist, Wayne Barstad, at (651)

DNR Information: 651-296-6157 • 1-888-646-6367 • TTY: 651-296-5484 • 1-800-657-3929

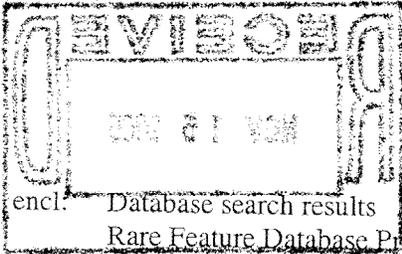


772-7940. Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources.

Sincerely,



Sarah D. Hoffmann  
Endangered Species Environmental Review Coordinator



encl. Database search results

Rare Feature Database Print-Outs: An Explanation of Fields

DELAISALLE ATHLETIC FACILITY

129N R24W SECTION 23, HENNEPIN COUNTY

19:27 Saturday, NOVEMBER 05, 2005

Minnesota Natural Heritage Database  
Element Occurrence Records

MnDNR, Natural Heritage and Nongame Research Program

Copyright 2005 State of Minnesota DNR

T029N R24W SWSE22 HENNEPIN COUNTY, MN

Element: FALCO PEREGRINUS (PEREGRINE FALCON) #43

State Status: THREATENED

EO Size: EO Rank: A

Site: MINNEAPOLIS 22

Ownership: Private

Managed Area(s): not managed or no record

Source: REDIG, P., TORDOFF, H. AND DNR NONGAME WILDLIFE PROGRAM  
NESTING AREA. MULTIFOODS TOWER.

Last Observed Date: 2002

DNR Region: 6

Wildlife Area: 610

Forestry District: 613

Quad Map: MINNEAPOLIS SOUTH (S16A)

Latitude: 44 58' 40" Long: 93 16' 21"

Precision: within 0.25 mile, confirmed

Voucher: Verification: verified

T029N R24W NWSE23 HENNEPIN COUNTY, MN

Element: BAT CONCENTRATION #40

EO Size: EO Rank: A

Site: CHUTE'S CAVE

Ownership: Owner unknown

Managed Area(s): not managed or no record

Source: NORDQUIST, G.E. (CO BIOL SURVEY 2000)

HIBERNACULUM: CHUTE'S CAVE. THIS LIMESTONE AND SANDSTONE CAVE AND ASSOCIATED MAN-MADE TUNNELS SUPPORT THE LARGEST NUMBER OF HIBERNATING PIPISTRELLUS SUBFLAVUS IN THE STATE (69 INDIVIDUALS WERE COUNTED IN ACCESSIBLE PORTIONS OF THE CAVE AND THE ESTIMATED TOTAL IS LIKELY NEAR 75). THIS CAVE/TUNNEL IS THE MOST IMPORTANT HIBERNACULUM FOR THIS SPECIES IN MINNESOTA.

Last Observed Date: 20 February 2000

DNR Region: 6

Wildlife Area: 610

Forestry District: 613

Quad Map: MINNEAPOLIS SOUTH (S16A)

Latitude: 44 58' 59" Long: 93 15' 10"

Precision: within 0.25 mile, confirmed

Voucher: Verification: photo rec.

T029N R24W SWSE23 HENNEPIN COUNTY, MN

Element: FALCO PEREGRINUS (PEREGRINE FALCON) #67

EO Size: EO Rank: A

Site: MINNEAPOLIS 23

Ownership: Owner unknown

Managed Area(s): not managed or no record

Source: TORDOFF, B.

NESTING AREA. CITY HALL.

Last Observed Date: 2002

DNR Region: 6

Wildlife Area: 610

Forestry District: 613

Quad Map: MINNEAPOLIS SOUTH (S16A)

Latitude: 44 58' 38" Long: 93 15' 55"

Precision: within 0.25 mile, confirmed

Voucher: Verification: verified

T029N R24W NWSE23 HENNEPIN COUNTY, MN

Element: PIPISTRELLUS SUBFLAVUS (EASTERN PIPISTRELLE) #28

State Status: SPECIAL CONCERN

EO Size: EO Rank: A

Site: CHUTE'S CAVE

Ownership: Owner unknown

Managed Area(s): not managed or no record

Source: NORDQUIST, G.E. (CO BIOL SURVEY 2000)

SIXTY-NINE INDIVIDUALS WERE RECORDED HIBERNATING IN CHUTE'S CAVE. THIS IS THE LARGEST NUMBER OF THIS SPECIES FOUND IN ANY HIBERNACULA IN MINNESOTA. NO OTHER

BAT SPECIES WERE OBSERVED REFER TO THE BAT CONCENTRATION REPORT FOR CHUTE'S CAVE AND ADDITIONAL INFORMATION

Last Observed Date: 20 February 2000

DNR Region: 6

Wildlife Area: 610

Forestry District: 613

Quad Map: MINNEAPOLIS SOUTH (S16A)

Latitude: 44 58' 59" Long: 93 15' 10"

Precision: within 0.25 mile, confirmed

Voucher: Verification: photo rec.

DELASALLE ATHLETIC FACILITY

T29N R24W SECTION 23, HENNEPIN COUNTY  
 MNDNR, Natural Heritage and Nongame Research Program  
 19:27 Saturday, NOVEMBER 05, 2005  
 Copyright 2005 State of Minnesota DNR

Minnesota Natural Heritage Database  
 Element Occurrence Records

T029N R24W SENW25 HENNEPIN COUNTY, MN  
 Element: BAT CONCENTRATION #29

EO Size: EO Rank: Current Status: Intended Status: Last Observed Date: 1988  
 Site: HEINRICH BREWERY CAVE  
 Ownership: Owner unknown  
 Managed Area(s): MISSISSIPPI NATL RIVER & RECREATION AREA  
 Source: HENDERSON, C. (DNR)  
 HEINRICH BREWERY CAVE. DOWNSTREAM FROM WASHINGTON AVE. BRIDGE, ON WEST SIDE OF RIVER AT FOOT OF 4TH ST. SOUTH. AN EXTENSIVE SYSTEM OF CAVES AS COOLING CHILLARS FOR BEER WAS EXCAVATED AROUND 1890 BY THE HEINRICH BREWERY (ALSO KNOWN AS MINNEAPOLIS BREWERY). 1988 VISIT FOUND EASTERN PIPISTRELLE BATS UTILIZING THE CAVE. A BAT GATE IS SCHEDULED TO BE INSTALLED AT ENTRANCE IN 1999.

DNR Region: 6  
 Wildlife Area: 610  
 Forestry District: 613

Quad Map: ST. PAUL WEST (S17B)  
 Latitude: 44 58' 14" Long: 93 14' 24"  
 Precision: within 0.25 mile, confirmed

Voucher: Verification: verified

T029N R24W SESE25 HENNEPIN COUNTY, MN  
 Element: FALCO PHEGRINUS (PEREGRINE FALCON) #65

State Status: THREATENED  
 EO Size: EO Rank: Current Status: Intended Status: Last Observed Date: 2002  
 Site: MINNEAPOLIS 25  
 Ownership: Owner unknown  
 Managed Area(s): MISSISSIPPI NATL RIVER & RECREATION AREA  
 Source: MARTELL, M. (1997 PEREGRINE REPORT)  
 NESTING AREA. I-94/RIVERSIDE PLAZA.

DNR Region: 6  
 Wildlife Area: 610  
 Forestry District: 613

Quad Map: ST. PAUL WEST (S17B)  
 Latitude: 44 57' 55" Long: 93 13' 38"  
 Precision: within 0.25 mile, confirmed

Voucher: Verification: verified

T029N R24W SENW25 HENNEPIN COUNTY, MN  
 Element: PIPISTRELLUS SUBFLAVUS (EASTERN PIPISTRELLE) #19

State Status: SPECIAL CONCERN  
 EO Size: EO Rank: Current Status: Intended Status: Last Observed Date: 1988  
 Site: HEINRICH BREWERY CAVE  
 Ownership: City Park  
 Managed Area(s): MISSISSIPPI GORGE REGIONAL PARK MISSISSIPPI NATL RIVER & RECREATION AREA  
 Source: NORDQUIST, G.  
 8-10 EASTERN PIPISTRELLES FOUND UTILIZING THE HEINRICH BREWERY CAVE AS A HIBERNACULUM AND POSSIBLY A DWELLING.

DNR Region: 6  
 Wildlife Area: 510  
 Forestry District: 613

Quad Map: ST. PAUL WEST (S17B)  
 Latitude: 44 58' 14" Long: 93 14' 24"  
 Precision: within 0.25 mile, confirmed

Voucher: Verification: verified

DEASALLE ATHLETIC FACILITY  
 T29N R24W SECTION 23, HENNEPIN COUNTY  
 MnDNR, Natural Heritage and Nongame Research Program

Mississippi Natural Heritage Database  
 Occurrence Records

RNG	PRIMARY SECTION	FED STATUS	MN STATUS	S RANK	ELEMENT and OCCURRENCE NUMBER	MANAGED AREA
R24W 22			THR		FALCO PEREGRINUS (PEREGRINE FALCON) #43	
R24W 23			THR		BAT CONCENTRATION #40	
R24W 23			THR		FALCO PEREGRINUS (PEREGRINE FALCON) #67	
R24W 23			SEC		PIPISTRELLUS SUBFLAVUS (EASTERN PIPITRELLA) #28	
R24W 25			THR		BAT CONCENTRATION #29	MISSISSIPPI NATL RIVER &
R24W 25			THR		FALCO PEREGRINUS (PEREGRINE FALCON) #65	MISSISSIPPI NATL RIVER &
R24W 25			SEC		PIPISTRELLUS SUBFLAVUS (EASTERN PIPITRELLA) #19	MISSISSIPPI GORGE REGION

# Rare Features Database Print-outs: An Explanation of Fields

The Rare Features database is part of the Natural Heritage Information System, and is maintained by the Natural Heritage and Nongame Research Program, a unit within the Division of Ecological Services, Minnesota Department of Natural Resources (DNR).

*\*\*Please note that the print-outs are copyrighted and may not be reproduced without permission\*\**

**Field Name:** [Full (non-abbreviated) field name, if different]. Further explanation of field.

-C-

**CBS Site:** [County Biological Survey site number]. In each county, the numbering system begins with 1.

**CLASS:** A code which classifies features by broad taxonomic group: NC = natural community; SA = special animal; SP = special plant; GP = geologic process; GT = geologic time; OT = other (e.g. colonial waterbird colonies, bat hibernacula).

**Cty:** [County]. Minnesota counties (ordered alphabetically) are numbered from 1 (Aitkin) to 87 (Yellow Medicine).

**CURRENT STATUS:** Present protection status, from 0 (owner is not aware of record) to 9 (dedicated as a Scientific and Natural Area).

-D-

**DNR Region:** 1=NW, 2=NE, 3=E Central, 4=SW, 5=SE, 6= Minneapolis/St. Paul Metro.

**DNR Quad:** [DNR Quadrangle code]. DNR-assigned code of the U.S. Geologic Survey topographic map on which the rare feature occurs.

-E-

**ELEMENT** or **Element:** See AElement Name (Common Name)@

**Element Name (Common Name):** The name of the rare feature. For plant and animal species records, this field holds the scientific name, followed by the common name in parentheses; for all other elements (such as plant communities, which have no scientific name) it is solely the element name.

**EO RANK:** [Element Occurrence Rank]. An evaluation of the quality and condition of natural communities from A (highest) to D (lowest).

**EO Size:** [Element Occurrence Size]. The size in acres (often estimated) of natural communities.

-F-

**FED STATUS:** [Federal Status]. Status of species under the Federal Endangered Species Law: LE=endangered, LT=threatened, C=species which have been proposed for federal listing.

**Federal Status:** See AFED STATUS@

**Forestry District:** The Minnesota DNR=s Division of Forestry district number.

-G-

**GLOBAL RANK:** The abundance of an element globally, from G1 (critically imperiled due to extreme rarity on a world-wide basis) to G5 (demonstrably secure, though perhaps rare in parts of its range). Global ranks are determined by the Conservation Science Division of The Nature Conservancy.

-I-

**INTENDED STATUS:** Desired protection status. See also ACURRENT STATUS.@ If a complete list of protection status codes is needed, please contact the Natural Heritage Program.

-L-

**LAST OBSERVED** or **Last Observed Date** or **Last Observation:** Date of the most recent record of the element at the location.

**Latitude:** The location at which the occurrence is mapped on Natural Heritage Program maps. NOTE: There are various levels of precision in the original information, but this is not reflected in the latitude/longitude data. For some of the data, particularly historical records, it was not possible to determine exactly where the original observation was made (e.g. "Fort Snelling", or "the south shore of Lake Owasso"). Thus the latitude/longitude reflect the mapped location, and not necessarily the observation location.

**Legal:** Township, range and section numbers.

**Long:** [Longitude]. See NOTE under ALatitude@

M-

**MANAGED AREA** or **Managed Area(s):** Name of the federally, state, locally, or privately managed park, forest, preserve, etc., containing the occurrence, if any. If this field is blank, the element probably occurs on private land. If "(STATUTORY BOUNDARY)" occurs after the name of a managed area, the location may be a private inholding within the statutory boundary of a state forest or park.

**Map Sym:** [Map Symbol].

**MINN STATUS:** [Minnesota Status]. Legal status of plant and animal species under the Minnesota endangered species law:

END=endangered, THR=threatened, SPC=special concern, NON=no legal status, but tracked. This field is blank for natural communities and colonial waterbird nesting sites, which have no legal status in Minnesota, but are tracked by the database.

-N-

NC Rank: [Natural Community Rank].

-O-

Occ #: [Occurrence Number]. The occurrence number, in combination with the element name, uniquely identifies each record.

OCCURRENCE NUMBER: See AOcc #@

# OF OCCURS: The number of records existent in the database for each element within the area searched.

Ownership: Indicates whether the site is publicly or privately owned; for publicly owned land, the agency with management responsibility is listed.

-P-

Precision: Precision of locational information of occurrence: C (confirmed) = known within 1/4 mile radius, U (unconfirmed) = known within 1/2 mile, N (non-specific) = known within 1 mile, G (general) = occurs within the general region, X (unmappable)=location is unmappable on USGS topographic quadrangles (often known only to the nearest county), O (obscure/gone)=element no longer exists at the location.

PS: [Primary Section]. The section containing all or the greatest part of the occurrence.

-Q-

Quad Map: See ADNR Quad@

-R-

Rec #: [Record number].

RNG or Rng: [Range number].

-S-

SECTION or Section: [Section number(s)]. Some records are given only to the nearest section (s), but most are given to the nearest quarter-section or quarter-quarter-section (e.g., SWNW32 denotes the SW1/4 of the NW1/4 of section 32). A "0" is used as a place holder when a half-section is specified (e.g., 0N03 refers to the north 1/2 of section 3). When an occurrence crosses section boundaries, both sections are listed, without punctuation (e.g., the NE1/4 of section 19 and NW1/4 of section 20 is displayed as ANE19NW20").

Site: A name which refers to the geographic area within which the occurrence lies. If no name for the area exists (a locally used name, for example), one is assigned by the County Biological Survey or the Natural Heritage Program.

Source: The collector or observer of the rare feature occurrence.

S RANK: [State Rank]. A rank assigned to the natural community type which reflects the known extent and condition of that community in Minnesota. Ranks range from 1 (in greatest need of conservation action in the state) to 5 (secure under present conditions). A "?" following a rank indicates little information is available to rank the community. Communities for which information is especially scarce are given a "U", for Arank undetermined@. The ranks do not represent a legal status. They are used by the Minnesota Department of Natural Resources to set priorities for research, inventory and conservation planning. The state ranks are updated as inventory information becomes available.

State Status: See AMN STATUS@

-T-

TWP or Twp: [Township number].

-V-

Verification: A reflection of the reliability of the information on which the record is based. The highest level of reliability is "verified," which usually indicates a collection was made or, in the case of bird records, nesting was observed. Plant records based on collections made before 1970 are unverified.

Voucher: The museum or herbarium where specimens are maintained, and the accession number assigned by the repository. In the case of bald eagles, this is the breeding area number.

-W-

Wildlife Area: The Minnesota DNR=s Division of Wildlife administrative number.

## Data Security

Locations of some rare features must be treated as sensitive information because widespread knowledge of these locations could result in harm to the rare features. For example, wildflowers such as orchids and economically valuable plants such as ginseng are vulnerable to exploitation by collectors; other species, such as bald eagles, are sensitive to disturbance by observers. For this reason, we prefer that publications not identify the precise locations of vulnerable species. We suggest describing the location only to the nearest section. If this is not acceptable for your purposes, please call and discuss this issue with the Environmental Review Specialist for the Natural Heritage and Nongame Research Program at 651/296-7863.



MINNESOTA HISTORICAL SOCIETY  
State Historic Preservation Office

November 23, 2005

Mr. Michael Orange  
Principal Planner  
City of Minneapolis  
210 City Hall  
350 South 5<sup>th</sup> Street  
Minneapolis, MN 55415

Re: EAW – DeLaSalle Athletic Facility  
Minneapolis, Hennepin County  
SHPO Number: 2006-0280

Dear Mr. Orange:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project. It has been reviewed pursuant to responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act and through the process outlined in Minnesota Rules 4410.1600.

Please note that the following comments are addressed to the city as the Responsible Governmental Unit for this project. We hope that they are useful to the city in dealing with historic preservation issues as part of the local permitting and decision-making process. Based on the information in the EAW, the project does not appear to have any involvement by federal or state agencies, and, therefore, it does not appear that the State Historic Preservation Office (SHPO) has an independent continuing review of the proposal. Some portions of the EAW (and supporting documents) are not clear on this point and imply a continuing SHPO review. It is important that the city understand that this is indeed **not** the case, and that the city needs to comprehensively address historic preservation issues as part of local review and approval processes.

All of Nicollet Island is located within the St. Anthony Falls Historic District, which is listed on the National Register of Historic Places and has been designated under the Minnesota Historic Districts Act. In addition, Nicollet Island itself has been designated under the Minnesota Historic Sites Act.

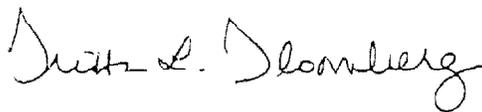
In the mid 20<sup>th</sup> century, the central area of Nicollet Island underwent a drastic change. The rows of commercial and residential buildings along Hennepin Avenue were removed, and the bridges across the river channels were replaced. Despite these changes, however, the historic character of the northern half of the island has survived, and two historic buildings, archaeological sites, and considerable open space remain on the southern end. Overall, the island maintains strong associations and patterns important to early riverfront history in Minneapolis. These attributes are detailed in the Historic Resources Survey report prepared by Landscape Research (October 2005).

We conclude that the proposed stadium would have a significant adverse effect on the historical character of the island and on the St. Anthony Falls Historic District. Grove Street currently establishes a strong visual and functional demarcation for the northern portion of the island. Here, the original 1860s street patterns are intact, as is the overall character of a residential neighborhood bordered by riverbanks. By removing half of the length of the original 1866 Grove Street, paving over portions of the riverbank area, and introducing a new structure of a scale and configuration not in keeping with the area's historic patterns, the feeling and character of the island would be substantially diminished. In this regard, we disagree with several of the conclusions presented in the response to question 25a of the EAW – namely that that the project will not have an adverse impact on the Grove Street Flats, the Nicollet Island Residential Area, or the St. Paul and Northern Pacific Railroad. On the contrary, we think that the feeling and setting of these areas and the island would be adversely impacted. Among the factors contributing to this impact are potential changes in volumes and patterns of traffic, increased lighting, and general intensification of land use.

Further, we concur with the recommendations of the Two Pines Resource Group regarding archaeological resources. As indicated in the EAW, their October 2005 report concludes that there is good potential for significant pre-contact and contact period archaeological sites in the project area, including the area proposed for parking along the riverbank. Additional archaeological work is needed before undertaking any terrain alteration of this area.

If we can be of assistance to the city as the historic properties issues of this proposal are addressed, please contact us at 651-296-5462.

Sincerely,



Britta L. Bloomberg  
Deputy State Historic Preservation Officer

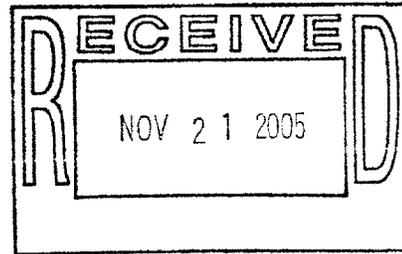
cc: Greg Mathis, Minneapolis Heritage Preservation Commission  
John Crippen, St. Anthony Falls Heritage Board  
Jon Gurban, Minneapolis Park and Recreation Board  
Michelle Terrell, Two Pines Resource Group  
Carole Zellie, Landscape Research  
Roger Randall, Preservation Alliance of Minnesota



# Minnesota Pollution Control Agency

November 16, 2005

Mr. Michael Orange  
Principal Planner  
City of Minneapolis  
210 City Hall  
350 South 5<sup>th</sup> Street  
Minneapolis, MN 55415



RE: DeLasalle Athletic Facility Environmental Assessment Worksheet (EAW)

Dear Mr. Orange:

Thank you for the opportunity to review and comment on the DeLasalle Athletic Facility EAW, in the city of Minneapolis. This comment letter addresses matters of concern to Minnesota Pollution Control Agency (MPCA) staff reviewing the EAW and is submitted for consideration by the city of Minneapolis, the Responsible Governmental Unit, in deciding whether an Environmental Impact Statement (EIS) should be prepared on the project.

It 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. We have attempted to identify and consult with interested program staff to identify the MPCA permits that may be required. Additional comments or requests for information may be submitted in the future to address specific issues related to the development of such permit(s). Ultimately, it is the responsibility of the project proposer to secure any required permits and to comply with any requisite permit conditions.

Based on the information contained in the EAW, the MPCA staff believes that significant effects related to MPCA issues are not likely to occur as a result of the project. However, please review and consider the following comments:

Item #8. Permits and approvals required

As stated in this section, an SDS Sanitary Sewer Extension Permit will be required. The permit should be obtained prior to commencement of any construction activity.

Item # 16, Erosion and sedimentation and Item #17, Water quality: Surface water runoff

The project lies within 2,000 feet of the Mississippi River, an impaired water, with a currently inactive TMDL for mercury and PCBs. At this time, no TMDL-based stormwater Best Management Practices are required.

Please note that a signed permit application, a site map and the \$400 permit fee must be submitted to the MPCA at least 7 days prior to the construction start date. After the 7 day MPCA review period, unless notified to the contrary, permit coverage begins and construction may be started.

Item #18.a. Water Quality: Wastewaters

The EAW states there is adequate capacity, but does not provide an estimated design flow based on maximum capacity of 750+ seats.

Mr. Richard Lehtinen  
Page 2

We look forward to receiving the required responses to our comments, as  
needed for an EIS. If you have any questions or concerns regarding this review,  
please call (651) 297-8236.

Sincerely,

A handwritten signature in black ink that reads "Denise Leezer". The signature is written in a cursive style with a large initial "D".

Denise Leezer  
Project Manager  
Environmental Review and Operations Section  
Regional Division

DL:jgo

Cc: David K. Johnson, MPCA St Paul  
David Sahli, MPCA St. Paul



Minnesota Department of Transportation

Office of Freight and Commercial Vehicle Operations

Mail Stop 420  
1110 Centre Pointe Curve  
Mendota Heights, MN 55120-4152

Tel: 651/405-6060  
Fax: 651/405-6082

November 23, 2005

Michael Orange, Principal Planner, City of Minneapolis

Re: Nicollet Island DeLaSalle Proposed Athletic Complex

Gentlemen:

Our office has reviewed the proposal for the DeLaSalle Athletic complex on Nicollet Island and offer the following comments:

1. The island has two (2) highway rail grade crossings and one (1) overpass. We recommend serious consideration be given to closing the East Island Avenue crossing. All traffic to the residential community north of the crossing would then be accessed via either the West Island Avenue crossing or the overpass at Nicollet Street.
2. At a minimum, we recommend that the two existing at-grade crossings be equipped with gates and flashing lights. In addition to gates and flashing lights, we recommend that pedestrian crossings be installed at both crossings. Our recommendations are based on poor sight lines at the crossing.
3. We recommend the athletic field be fenced along the railroad tracks to prevent pedestrians and athletes from straying onto railroad property. We would also recommend fencing be installed on the northern portion of the tracks to keep pedestrians using the island trails from entering the track area.

Thank you for the opportunity to review and comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan H. Aylesworth'.

Susan H. Aylesworth, P.E.  
Office of Freight & Commercial Vehicle Operations  
Minnesota Department of Transportation

Via email/hard copy to follow in the mail



**Spencer D. Arndt**  
Assistant Director Public Projects

**BNSF Railway Company**  
80 - 44<sup>TH</sup> Avenue N.E.  
Minneapolis, MN 55421  
Email: [spencer.arndt@bnsf.com](mailto:spencer.arndt@bnsf.com)  
Telephone: 763-782-3478  
Fax: 763-782-3061  
Cell: 612-802-9415

November 21, 2005

Michael Orange - Principal Planner City of Minneapolis

RE: Nicollet Island DeLaSalle Proposed Athletic Complex.

Gentlemen:

I have reviewed the proposal for the DeLaSalle Athletic complex on Nicollet Island and offer the following comments:

- BNSF train traffic is 50+ trains per day thru this area.
- The Nicollet Street overpass provides the only way over the tracks on that end of the island and closing the east half of Grove Street would cut off direct access to the overpass from the East Island Avenue. A driver going North on East Island and encountering a train on the crossing would most likely make a U-turn and go to the south end of the Island and back to Grove Street to reach Nicollet. What is happening is driver behavior might force drivers to try to beat the train.
- Pedestrians walking along the proposed trail need to be forced to stay on the trail by fencing the entire r/w along our tracks.
- Restrictions need to be put in place to prevent vehicles from parking too close to the track areas.
- The existing at-grade rail crossings are two track crossings with no gates and recommend they be upgraded with gates for the drivers and pedestrian flashers due to the increased traffic flows that will occur during the events taking place at the new complex.
- Overall site plan adds additional traffic (drivers and pedestrians) to the site and our concern is drivers and pedestrians having many other things on their mind as they approach the at-grade railroad crossings. Public safety does not appear to have been addressed for drivers and pedestrians at the railroad crossings.
- Overall review of the project should also be made by Susan Aylesworth, Mndot Office of Railroads. Susan may be reached on 651-406-4798.
- Direct all future correspondence regarding this matter to Lynn Leibfried, Manager Public Projects at [lynn.leibfried@bnsf.com](mailto:lynn.leibfried@bnsf.com). Lynn may be reached on 763-782-3492.

Spencer D. Arndt

**From:** Erin Jordahl-Redlin [ejredlin@cleanwater.org]

**Sent:** Wednesday, November 23, 2005 10:04 AM

**To:** Orange, Michael

**Cc:** 'Patience Caso'; scagle@bitstream.net

**Subject:** EAW for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis  
November 23, 2005

J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
Community Planning and Economic Development Department  
City Hall Room 210  
350 South 5<sup>th</sup> Street  
Minneapolis, MN 55415

Re: Environmental Assessment Worksheet for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis

Dear Mr. Orange:

Clean Water Action Alliance (CWAA) appreciates the opportunity to submit comments on the Environmental Assessment Worksheet prepared for the DeLaSalle High School Athletic Facility proposed for Nicollet Island. CWAA has several questions and concerns about the proposed project's potential impact on water quality.

**Item # 6 Project description**

The description states that the football/soccer field is proposed to be natural grass, but pervious artificial turf may be considered.

What is the expected difference in permeability between natural grass and artificial turf, as this could actually increase the amount of impervious surface currently on site?

What is the maintenance plan for natural grass?

What pesticides and fertilizer will be used and what is the application schedule?

What is the plan to mitigate the effects of chemical runoff from the field?

What is the maintenance plan for artificial turf?

What is the plan to mitigate the effects of runoff from the field?

**Item # 11 Fish, wildlife and ecologically sensitive resources**

Was a wildlife use survey completed for the site?

Just because no "ecologically sensitive areas or natural areas" remain on or near the site does not mean

that wildlife are not inhabiting the area.

**Item #13 Water use**

What is the potential impact of an irrigation system on the site?

What is the plan to mitigate the effects of runoff from the field created by an irrigation system?

**Item #17 Water quality: Surface water runoff**

If the proposed project does use artificial turf rather than natural grass for the football/soccer field, what is the difference in permeability?

How does a potential increase in impervious surface affect the cumulative impact of the proposed project?

How will the installation of a drain tile system affect the geology and hydrology of the site?

What is the cumulative impact of increased stormwater pollution into the Mississippi River from the proposed project, including oil, gas, pesticides, and fertilizer?

**Item #20 Solid wastes, hazardous wastes, storage tanks**

What is the plan to collect trash not deposited in trash receptacles?

Will "clean up days" be scheduled before expected weather events (rainstorms, spring thaw, etc)?

Where and how will the chemicals for the natural grass field be stored?

Thank you for the opportunity to comment on this proposed project.

Erin Jordahl-Redlin  
Energy Campaign Coordinator  
Clean Water Action Alliance of Minnesota  
308 East Hennepin Avenue  
Minneapolis, MN 55414  
612-623-3666  
612-623-3354 FAX  
ejredlin@cleanwater.org



# Friends of the Mississippi River

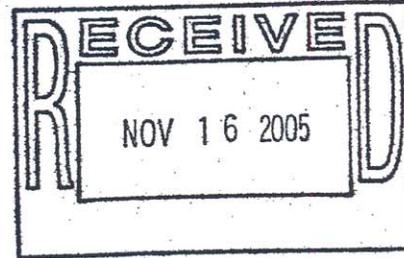
46 East Fourth Street, Suite 606 • Saint Paul, MN 55101 • 651/222-2193 • fax 651/222-6005 • [www.fmr.org](http://www.fmr.org)

*Working to protect the Mississippi River and its watershed in the Twin Cities area*



November 14, 2005

Michael Orange  
City of Minneapolis  
210 City Hall  
Minneapolis, MN 55415



Dear Mr. Orange,

Please accept the following comments from Friends of the Mississippi River regarding the Environmental Assessment Worksheet for the proposed DeLaSalle High School Athletic Facility.

**Item #11. Fish and Wildlife and Ecologically Sensitive Resources.** The project is located in the middle of a regional park on the Mississippi River, which is the largest river ecosystem on the continent. Although development has occurred at the site in the past, it is still surrounded by important ecological resources. Nicollet Island provides much needed refugia along the migration route of over 60% of all North American bird species and over 40% of all North American waterfowl. The EAW should acknowledge and mitigate any potential damage to migratory bird species or other wildlife species that would be disturbed by new development, fences, retaining walls and bright lights. The fact that the island is surrounded by dense development and tall buildings makes the habitat on Nicollet Island that much more critical to the birds and wildlife that depend upon it.

**Item #14. Water Related Land Use Management Districts.** The proposed project is within the State Critical Area and the Mississippi National River Recreation Area (MNNRA). The Shoreland Overlay District of the Minneapolis Zoning Code does not properly address all the requirements of Minnesota State Law regarding the Mississippi River Critical Area. Critical Area also includes standards that apply to impacts to scenic, cultural and historic resources. More specifically, a fenced athletic field is NOT a river-oriented recreational use, nor does it enhance the environment. Taking statements out of context that are not true does not reflect the intent of Executive Order 79-19. The project has the potential to harm the scenic and environmental resources of Nicollet Island, and the EAW should offer solid suggestions for how to mitigate these impacts.

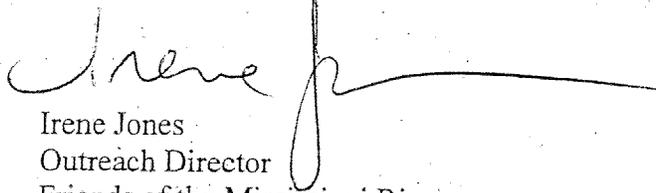
**Item #26. Visual Impacts.** The project as proposed will have visual impacts on the adjacent park and the river corridor, especially scenic views from the east channel and bank. Specifically, the historic bucolic character of the island will be impacted by an athletic field that is out of character and scale with the rest of the park. "Sense of Place" is a hard thing to measure, but impacts to sense of place will be the most significant ones this project has to the surrounding

environment. The City needs to carefully address how this project may impact a visual jewel that benefits the river corridor and adjacent residential development.

**Item #27. Compatibility with Plans and Land Use Regulations.** See Item #14 above.

In closing, Friends of the Mississippi River would like to encourage the proposer to look at alternative sites for this project, such as the B.F. Nelson site across the river. This area is much more well-suited to an athletic field of this size and would offer more opportunities to mitigate impacts to scenic and natural resources, as well as those from traffic and noise.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Irene Jones", with a long horizontal flourish extending to the right.

Irene Jones  
Outreach Director  
Friends of the Mississippi River  
651/222-2193 ext. 11

November 16, 2005

City of Minneapolis  
Attn: Michael Orange, Principal Planner  
210 City Hall  
350 South Fifth Street  
Minneapolis, MN 55415

Reference: EAW for DeLaSalle Athletic Facility

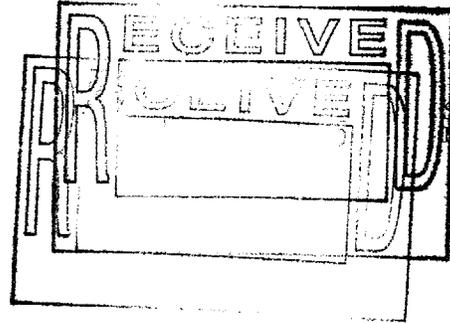
Dear Mr. Orange:

Thank you for the opportunity to comment on this EAW. The proposed facility will be a major undertaking affecting a broad range of constituencies, so full consideration of its impact is essential.

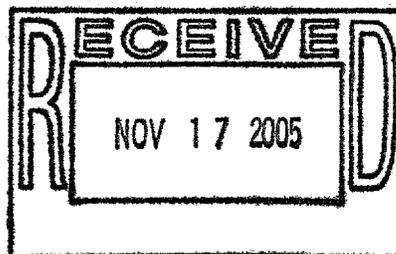
First, let me introduce myself. My name is Robert Mack and I am a principal with the firm of MacDonald & Mack Architects, Ltd., a 29-year-old firm specializing in the preservation and rehabilitation of existing properties, many of them with historic designation. Early in my professional career I assisted in preparing the documents which are now known as *The Secretary of the Interior's Standards for Rehabilitation* and the accompanying *Guidelines*. In addition to my architectural practice I am an Adjunct Professor in the College of Architecture and Landscape Architecture at the University of Minnesota where I teach a year-long series of graduate-level classes on historic preservation. In 1979 my firm, along with Miller-Dunwiddie Architects, prepared a comprehensive preservation and planning study for the area within the boundaries of the Riverfront Development Coordination Board jurisdiction, which is essentially the same as the boundaries of the St. Anthony Falls Historic District.

The focus of my comments, therefore, will be the impact of the proposed study on the historic resources of Nicollet Island and of the larger St. Anthony Falls Historic District.

**Item 8: Permits and approvals required.** I am not an attorney, but it is my understanding that this project would require review by the State Historic Preservation Office since it is a public agency which is having an effect on the historic resource.



Stuart MacDonald, AIA  
Robert C. Mack, FAIA



Suite 712  
Grain Exchange Building  
400 South Fourth Street  
Minneapolis, Minnesota  
55415

Tel 612 341 4051  
Fax 612 337 5843  
E-mail info@mmarchitects.com

**Item 25: Nearby resources.** This item describes the impact of the project on archeological and historic resources; the historic portion is based on a report prepared by Carole Zellie in September 2005. While Ms. Zellie's report is generally well researched and well documented, it is not without errors. The left-hand image in Figure 7, for example, is not the Grove Street Flats

Ms. Zellie comes to the conclusion that the proposed facility will have an adverse effect on the landscape features of the district. She continues by stating that the athletic field will not adversely effect any of the buildings, themselves. While it may be true that the field and stadium will not physically damage the building, Ms. Zellie's report fails to incorporate the professional accepted concept of "viewshed." In this concept, the manner in which a project effects views to and from historic resources is evaluated for its impact. Clearly the proposed stadium will effect these views and thus must be considered an adverse effect on the Grove Street Flats, in particular, and to views throughout the district as a whole.

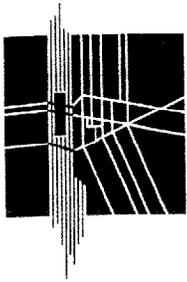
I use Nicollet Island as a wonderful example of an unplanned "architectural museum." The Island has excellent examples of Italianate, Gothic revival, French Second Empire, Greek revival, Egyptian revival, and other design styles, and my students welcome seeing so many examples in one place. Furthermore, I know many people besides myself who take visitors to Nicollet Island to look at the buildings and to relish this urban oasis. Preserving the views is important to maintaining the integrity of the district.

The proposed project is in clear violation of *The Secretary of the Interior's Standards for Historic Preservation Projects*; these nationally recognized standards apply to landscapes and to new construction in historic districts, as well as to work on designated historic buildings. Historic resources, districts in particular, are fragile resources which are too easily "chipped away at" by projects such as this. The St. Anthony Falls Historic District has already had one "redefinition" since its initial listing, caused by inappropriate changes. I believe, therefore, that the EAW should be amended to more fully evaluate the damage done to the Nicollet Island portion of the St. Anthony Falls Historic District by the proposed project.

Sincerely yours,



Robert C. Mack, FAIA  
Principal



**Nicollet Island - East Bank  
Neighborhood Association (NIEBNA)  
132 Bank St SE  
Minneapolis, MN 55414**

*November 23, 2005*

J. Michael Orange, Principal Planner  
CPED-Planning Division  
350 South 5<sup>th</sup> Street Rm. 210  
Minneapolis, MN 55415

Dear Mr. Orange,

NIEBNA is the official neighborhood association representing residents of both Nicollet Island and the rapidly expanding East Bank neighborhoods.

Our comments on the EAW submitted by De La Salle High School for their Athletic Facility Project on Nicollet Island are attached. These comments were unanimously approved and adopted by the NIEBNA Board at its meeting on November 21<sup>st</sup>, 2005.

Please contact me with any questions.

For the *Nicollet Island East - Bank Neighborhood Association*:

---

P. Victor Grambsch  
President

Voice: 612-702-7211

Email: [pvictor@eudaemonics.com](mailto:pvictor@eudaemonics.com)

cc                    NIEBNA Board of Directors

*Attachment:*    Comments

Comments of the NIEBNA Board of Directors  
On the EAW for Proposed Athletic Facility on Nicollet Island

1. **Section 6b:** The physical description of the project is lacking in several significant areas.
  - a. The description refers to "Attachment D Project Elevations". Attachment D provides artistic renderings not elevation drawings. Elevations have a specific architectural meaning and are critical to the understanding of the impact of any development. The EAW should contain correct elevation drawings of the complete project in context of the surrounding environment with views from East Island Dr., Grove Street and the Park just north of the railroad tracks.
  - b. The project should state specifically what the field will be – either grass or artificial turf. If the developer does not have sufficient information to determine this most basic and critical design element, then they likely do have sufficient information for the project as a whole.
  - c. The developer states, "On the north, east and south edges of the site, a four-foot-tall decorative fence will be installed on top of the retaining walls..." This trivializes one of the major components of the Facility, namely the 400 foot long retaining wall that will run from De La Salle's existing field all the way to the railroad tracks. This wall is expected to be about 10' high with a 4' fence on top. In addition to a better description of this component and its visual impact on the open space parkland, we feel the developer should include perspective images of the retaining wall as seen from East Island Dr.
2. **Section 11a:** It is indeed true that no "natural areas remain" on the site.
  - a. This trivializes the efforts in over the past 30 years to finally turn Nicollet Island into public park – a dream that has been with the City of Minneapolis for over 150 years.
  - b. The industrial land on the site has undergone intensive rehabilitation including planting of native prairie species to reclaim the soil as well as the planting of over 150 trees. Unlike development, natural rehabilitation can take a generation or two to reach fulfillment.
3. **Section 11b:** There are indeed state-listed species on or near the site.
  - a. Bald Eagles which frequent Nicollet Island are listed as special concern species by the MN DNR. 70' tall lighting towers and 76 decibel loud speakers are certain to have an impact on their habitat.
  - b. In addition to eagles, Nicollet Island is host to many species of hawk, beaver, fox and even deer.
  - c. The developer should conduct an independent study of the wildlife on Nicollet Island to determine if there are any other state-listed species on the site.

Comments of the NIEBNA Board of Directors  
On the EAW for Proposed Athletic Facility on Nicollet Island

4. **Section 21:** The traffic assessment appears to be seriously flawed and should be redone.
- a. The traffic study only assesses the impact of the 750 seat Facility ignoring the fact that many of the peak parking events will overlap with weddings and functions at the Nicollet Island Pavilion. Total estimated trips to Nicollet Island may be twice as great as presented in the EAW.
  - b. The Build and No-Build traffic forecasts come to the unbelievable conclusion that if the Athletic Facility is constructed, there will be *fewer trips* to Nicollet Island. From the traffic map on page 17 of the EAW, the total number of trips to Nicollet Island if the Facility is not built is 3100. If the Facility is built (numbers in boxes) this number decreases to 2800 trips. This alone calls into question the entire traffic study.
  - c. The final paragraph discusses emergency response to the residences on Nicollet Island. This section needs further development. The closest Fire Department would approach Nicollet Island from 1<sup>st</sup> Avenue. In this case, their closest path to West Island Drive is directly in front of De La Salle – a road that is currently private. Will this road become a fire lane? The EAW should include exact routes and estimated response times submitted by both the Fire and Police Departments. These times should be compared to recommended maximum response times.
5. **Section 25:** The impact on the rail transportation corridor just north of the proposed facility is underdeveloped.
- a. The Nicollet Street Bridge, replaced in 1996, has a hidden opening to accommodate an additional light rail line. Every new bridge over these tracks including the new Main Street bridge to be completed in 2006 has a similar second opening for the future light rail. The extra costs of these second openings were of course paid for through public taxes. The Athletic Facility will be built over the proposed path of the light rail, crippling any effort to install light rail along this line. Light rail has proven very popular in Minneapolis and there is reason to believe that this planned line will move up in priority over the next 10 years.
  - b. In the discussion of the 1983 Contract for Acquisition and Transfer of Lands for Redevelopment by Public Bodies, the developer neglects two key points. First of all, the proposed "Athletic Facility" already exists on the site. De La Salle was permitted encroachment onto the right-of-way (sidewalk) of Grove Street and parking lanes of both Grove Street and East Island Drive to construct a "(regulation) size football field" and there are three tennis courts across Grove Street from the football field. These two comprise the "Athletic Facility" described in the 1983 agreement. The second point neglected by the developer is that the current proposal is in violation of the 1983 agreement as it no longer provides tennis courts "adjacent to the De La Salle Property."

Comments of the NIEBNA Board of Directors  
On the EAW for Proposed Athletic Facility on Nicollet Island

6. **Section 26:** Proper lighting levels are clearly not understood by the developer.
  - a. The developer proposes to "...attain a standard of no more than 1 foot-candle outside Project limits." The Illumination Engineering Society (IES) recommends an average roadway lighting level of only 0.28 foot-candles for residential neighborhoods. For commercial roadway areas such as Hennepin Avenue in downtown the recommended lighting level is 0.56 foot-candles. The developer is proposing to flood the open space park land and nearby residences with almost twice the recommended lighting of a downtown commercial district.
  - b. When lighting was first installed in Nicollet Island the intermediate illumination level (0.46 foot-candles) was chosen. Because of unanimous public outcry, the streetlights were dropped from 100W to 50W in order to achieve residential illumination levels. The Minneapolis Park Board agreed that as lights on Nicollet Island needed replacement, they would all be fitted with the lower wattage versions.
  
7. **Section 27:** There is no mention of the site's status as a Regional Park
  - a. Regional Park land is subject to a restrictive covenant because of the funds used to purchase them. According to Peter Bell, the Chair of the Metropolitan Council, "Regional open space money cannot be used to acquire land which would be used for athletic facilities or to construct athletic facilities." The proposed development would require the repayment of \$1,065,000 used to purchase the land



# Preservation Alliance of Minnesota

"...to preserve, protect and promote Minnesota's historic resources"

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Bonnie C. McDonald

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Marvel Anderson –  
Rush City

November 22, 2005

(Hard copy to follow by mail)

J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
City of Minneapolis  
City Hall Room 210  
350 S. 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385

Dear Mr. Orange:

On behalf of the Preservation Alliance of Minnesota, I am writing to comment on the Environmental Assessment Worksheet (EAW) for the DeLaSalle High School Athletic Facility. The Alliance is Minnesota's only statewide, membership-based nonprofit preservation organization in Minnesota and it is our mission is to preserve, protect, and promote Minnesota's historic resources.

DeLaSalle's proposed athletic facility is located within the St. Anthony Falls Historic District, recognized in the National Register of Historic Places and as a local historic district. The EAW indicates that only the closure of Grove Street would have an adverse impact on the historic district. We ask that the City of Minneapolis prepare an Environmental Impact Statement to reconsider how the athletic facility's scale, structures, and lighting fixtures will relate to, and impact, the historic feeling and setting of its adjacent small-scale residential properties.

Furthermore, the EAW indicated that the athletic facility has the potential to contain archaeological resources that may also be significant. Although the EAW states that DeLaSalle would consult with appropriate agencies regarding a program for archaeological investigation, it does not propose ways to avoid and mitigate the adverse impact. Nor does the EAW address measures to avoid and mitigate the impact by the closure of Grove Street. Appropriate measures of avoidance or mitigation should be clearly specified in the EAW or Environmental Impact Statement.

(cont.)

Finally, the Alliance requests that the City reassess the impact of the project within the whole of the St. Anthony Falls Historic District. The EAW indicates that no additional cumulative impacts are known at this time. The Alliance suggests that the proposed project should be considered in relation to other current and proposed projects within the St. Anthony Falls Historic District. These projects, of which the DeLaSalle Athletic Field is one, may be considered to have a cumulative adverse impact to the historical integrity of the entirety of the historic district. Such considerations should be addressed in an Environmental Impact Statement.

Thank you for the opportunity to comment on the EAW for the DeLaSalle Athletic Facility. The Alliance recognizes the significant contribution that DeLaSalle has made to Minneapolis' history and the school's need to provide for athletic facilities. However, we encourage school leaders and those reviewing this project to consider alternate sites that will not adversely impact our invaluable historic resources.

Sincerely,

Roger D. Randall  
Chair

cc: Steve Christenson, PAM Member  
Greg Mathis, City of Minneapolis HPC  
Dennis Gimmestad, Minnesota SHPO

From: Margie Grilley [mgrilley@mninter.net]  
Sent: Wednesday, November 23, 2005 12:50 PM  
To: Orange, Michael  
Cc: Dorian Grilley  
Subject: DeLSalle High School Athletic Facility EAW

November 23, 2005

J. Michael Orange  
Principle Planner  
Minneapolis Planning Division  
Community Planning and Economic Development Department  
City Hall Room 210  
350 S. 5th Street  
Minneapolis, MN 55415-1385

Dear Mr. Orange,

I am writing to express the concerns of the Parks & Trails Council of Minnesota about the compatibility of the proposed DeLaSalle High School Athletic Facility with the objectives stated in the 1996 Nicollet Island Master Plan. We do not feel that the proposed facility is compatible with the objectives of the regional park, especially Objective 5, Preserve and enhance the island's natural landscape character.

Should the project proceed we feel that the Minneapolis Parks and Recreation Board should be required to comply with the Metropolitan Council's requirements for removing the property from the regional park and replacing the land with a similar park resource of equal or greater value. This land should be within the same park or in the Mississippi River's Critical Area.

I appreciate the opportunity to comment on this EAW. Please feel free to contact me with any questions you may have.

Sincerely,

Dorian Grilley  
Executive Director  
Parks & Trails Council of Minnesota  
275 E. 4th Street #642

St. Paul, MN 55101  
651-726-2457



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— VIA ELECTRONIC MAIL —

Mr. Michael Orange, Principal Planner  
City of Minneapolis  
210 City Hall  
350 South Fifth Street  
Minneapolis, Minnesota 55415

November 23, 2005

**Re: The Environmental Assessment Worksheet prepared by the City of Minneapolis for the DeLaSalle High School Athletic Facility proposed for One DeLaSalle Drive on Nicollet Island in the City of Minneapolis**

Dear Mr. Orange:

Thank you for the opportunity to provide public comment on the Environmental Assessment Worksheet for the DeLaSalle Athletic Facility proposal (Proposal). For the reasons stated below, due to the inadequate consideration of alternatives to the Proposal, and because implementation of the Proposal would likely lead to significant environmental and social impacts, the Sierra Club believes that an environmental impact study for this project is both warranted and prudent.

All of the land on Nicollet Island except the DeLaSalle property, three multi-family residential structures, and the existing rights-of-way, was acquired to create a regional park for the benefit of all the people of Minneapolis and surrounding communities. Further, the park is surrounded by a segment of the Mississippi River that has been designated as “wild and scenic.” If the publicly owned open space on Nicollet Island were restored to parkland habitat, it would provide a conservation and recreational ‘jewel’ amidst a densely populated and highly developed urban and historical area. In contrast, the Proposal would destroy a meadow that contains 21 trees that were planted to commemorate the 150<sup>th</sup> anniversary of the University of Minnesota.

Additionally, the new facility would introduce a new activity with seating for 750 spectators, lights, and loudspeakers – all of which do not currently exist on this island. The field lighting would be mounted on 70 foot poles, and the applicant acknowledges that the lighting would be visible off site and would intrude on the view of the downtown skyline in the vicinity of the project. Not only will the noise and lighting be problematic for neighboring property owners and visitors, they would likely impact and disrupt migratory and nesting birds on Nicollet Island. It is noteworthy that Nicollet Island is located along the migration route of over 60% of all North American bird species and over 40% of all North American waterfowl.

Further, it is remarkable that the Environmental Assessment Worksheet is totally void of any discussion regarding alternative citing options for the proposed athletic facility. The Sierra Club is greatly concerned that alternative building sites, both on and off Nicollet Island, were not discussed that would generate fewer environmental and social impacts. Overall, the scale of the proposed athletic facility is too large for the available land, as was noted by two landscape architects that served on the Citizen's Advisory Committee. The visual impacts are not compatible or consistent with the historic designation of the district or with the view shed from the river.

Finally, the Proposal would ultimately strip the right to use public land from the citizens of Minneapolis. The Critical Area Plan states that "Nicollet Island should be maintained in a manner which will promote public use and enjoyment for all segments of the population." A Reciprocal Use Agreement that is contemplated between the City of Minneapolis and DeLaSalle High School is not in the best interest of Minneapolis citizens and would limit access to the recreation area. As was discussed in our July 15, 2005 letter to the Minneapolis Park and Recreation Board, the Sierra Club acknowledges DeLaSalle's outstanding reputation in the community and its devotion to educating a wide range of teenagers from all income levels. Nevertheless, this is a debate over a valuable piece of property available now to all citizens of the state, and that would change under the proposed Reciprocal Use Agreement. There is a much greater need for the preservation of open and recreational space on Nicollet Island, which would be open at all times to use by all Minneapolis citizens.

The Sierra Club wishes to express its appreciation for your consideration in reviewing these comments. We look forward to working with you as this project progresses.

Sincerely,

/s Frank Jossi

/s Sharell Benson

Frank Jossi, Co-Chair  
Land Use and Transportation Committee  
Sierra Club North Star Chapter

Sharell Benson, Co-Chair  
Land Use and Transportation Committee  
Sierra Club North Star Chapter

From: judy bartl [judyb2@hotmail.com]  
Sent: Monday, November 21, 2005 7:52 PM  
To: ourbeautifulriver@mac.com  
Cc: Orange, Michael  
Subject: DeLaSalle stadium noise

A comment regarding the recent letter sent to me as Dear Neighbor:

I hardly think that the loudspeakers at DeLaSalle High School's stadium could be any more intrusive into my waking and (often interrupted) sleeping hours as the trains that constantly rumble, roar and squeek by my home.

Why not focus your energy on trying to do something about regulating that schedule to reasonable hours?

Thank you,  
Judy Bartl  
Village Lofts resident

From: Betty Belfiore [esb@umn.edu]  
Sent: Sunday, November 20, 2005 10:38 AM  
To: Orange, Michael  
Cc: Peter Belfiore  
Subject: De La Salle

Dear Mr. Orange,

We are writing to you concerning the proposed De La Salle athletic field on Nicollet Island. We are strongly opposed to this project, for many reasons:

--This construction on public property will primarily benefit a private school.

--It will have a negative impact not only on the residents of Nicollet Island, but also on all of us who live and work in Minneapolis, or who visit the city from out of town, and who enjoy the peace and quiet of this unique historic space

--It will radically change the historic atmosphere of Nicollet Island --It will create traffic, trash, noise, light pollution and congestion --It will delay and interfere with emergency responses --The proposed public use of these athletic facilities is minimal, and will not compensate for the destruction to the existing park land --It will set an unfortunate precedent of giving public property to private entities

--The students at De La Salle will suffer only minor inconvenience if they are unable to hold some athletic events at their school.

This is not a question of "elite," wealthy residents opposing a project that benefits disadvantaged children (as spokespeople for De La Salle have sometimes suggested). It is instead a question of public property that is now enjoyed by everyone--rich and poor, residents and visitors, young and old--being given away for the mere convenience of a few students in a private school, who do not need a home field in order to succeed in academic or even athletic activities.

Please work to preserve the outstanding public park system that helps to make Minneapolis a great place to live, work and visit. This is one of the city's most important assets, and we owe it not only to ourselves, but also to future generations, to preserve and improve it.

Sincerely,

Elizabeth and Peter Belfiore  
9 4th Ave North, #102  
Minneapolis 55401  
612-359-6934

From: Sid and Lola Berg [sberg2@mn.rr.com]  
Sent: Wednesday, November 23, 2005 5:44 PM  
To: Orange, Michael  
Subject: MPRB-DeLa Salle EAW Comments

The following are comments concerning the EAW Report

Item 6B---The EAW document states that the sand-based football/soccer field (390'X200') is proposed to be natural grass but mat may be artificial material. If natural grass, the EAW makes no mention of fertilizer and/or herebicides to be used and the consequent run-off pollutants to the environment and the Mississippi River.

Item 16--EAW is to provide the acreage to be excavated or graded and cubic yards of soil to be moved:

acres and cubic yards. Neither are included in the document. One estimate is 30,000 cubic yards to be moved. At 9 cubic yards per truck load, it will take weeks just to move and fill in the needed soil.

Item 17--Surface water run-off

The document does not indicate how much MORE fertilizer and herbicides than is currently used and, therefore, the increased run-off pollution. It also makes no mention of the increased cost of fertilizer and herbicides over current costs.

Item 21--Traffic---Executive summary of TDM Plan

Bullet Ppoint 2

"Closing Grove Street will increase traffic on North end of Nicollet Island from 300 to 400 cars per day--significantly less than the 1000 cars per day maximum." This is true but it must be remebered that both East and West Island Avenues were deliberately narrowed yo make them multi-use roadways (hikers, bikers, runners, strollers, etc.) to slow traffic, one of the residents earlier concerns when theroadways were rebuilt.

Much talk has been made about use of the athletic complex for city-wide youth. The EAW contains no comment about how the city-wide youth will have access to the complex. Is De LaSalle going to send buses to the various neighborhoods to pick up young people and bring them to tha

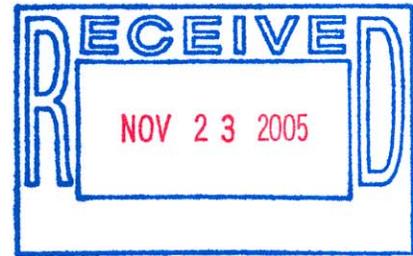
complex? Will De LaSalle establish hours of use such that they will impinge on the accessibility of the complex? Some comment must be made by De LaSalle and the MPRB

concerning the

issue of accessibilty.

November 22, 2005

J. Michael Orange  
Principal Planner  
Minneapolis Planning Division  
Community Planning and Economic Development Department  
City Hall Room 210  
350 South 5<sup>th</sup> Street  
Minneapolis, Minnesota 55415-1385



Written comments regarding the proposed De La Salle athletic facility have been solicited. As a parent of a current and former De La Salle student and a sibling of former De La Salle students, I would like to express some views.

The Planning Commission is in a somewhat difficult position of having to make a decision on this potential redevelopment that will not be able to satisfy the wants or needs of all interested parties. The responsibility of land use is a serious one and as I have seen often an emotional one.

The EAW document is the first step in detailing what potential environmental impacts might be seen should the proposal move forward. If nothing is done to move the project forward, that will have an environmental impact. This may be deemed valuable by some, but not by all. If the project becomes a reality, a different environmental impact will be made. Neither may be inherently bad or good, just different. Minneapolis Park and Recreation seems to have determined that this particular land use would satisfy some common good charges they have. Currently, the city proper has a lack of adequate recreational space for events that would or could be held at this facility and this would fill some of that void. I am in support of the proposed use of the land provided that the further exploration of the environmental impact does not disclose any truly negative reasons to abandon the use.

I am also a biological sciences professional and have not seen any evidence thus far that would deter the project on adverse biological impacts to sensitive life forms or habitats.

In the EAW document for the proposed athletic field, Section 11a and 11b discuss the potential impact to wildlife in ecologically sensitive areas. At the public hearing conducted at De La Salle November 15, 2005, several speakers described views at odds with the environmental "No Adverse Impact" statement. I am in agreement with the interpretation that the environmental impact will be minimal. As is stated in the EAW, the island is part of the Minneapolis city proper that has been developed and re-developed since the early days of the city. The environment that many of those opposed to the project are trying to protect is neither "what once was" nor endangered by this field. Many of the speakers talked about insect and flower varieties as well as mammals viewed as unique to the island. I would disagree—rabbits, fox, deer, groundhogs, and even eagles are adapted (or adapting) to urban settings as their original habitat disappears and all of these are actually somewhat common in many parts of the metro area. The wildflowers

protected—they are the same ones seen along many highways and in uncultivated fields or city lots. The gentleman who referred to the eco-system on the island does apparently not understand that eco-systems take many more years than the time since the park district has been responsible for the island to develop and that the “meadow” referred to by another gentleman is not a meadow in the true sense of the word. It is a grassy cover over rock and limestone (which has been disturbed more than once over the last century and a half). Insects mentioned to be in abundance are routine varieties and extremely adaptable.

Section 21. Traffic. The observations about usage and traffic flow seem reasonable. I would like to see a little more elaboration on the movement of emergency vehicles with full parking in the lot(s) and around the school. It would be important to know how easily an ambulance or fire truck could reach and leave the field (if an athlete or spectator required service) and how easily one or more residents homes could be served if all lot spaces were in use and some street parking was also in use. It appears that the comments from the fire department do not specifically detail if the service will be the same for the field and or the residents if parking is heavy.

Section 24. Noise. There will obviously be additional noise on the island should the project move forward. Many of the speakers opposed to the project indicated the increased noise would not fit the guidelines of the area outlined for the Scenic Wild River and the protection offered that area under those guidelines. Were these same objectors speaking for the noise level over the river when the new Minneapolis-St. Paul International runway was proposed? Certainly, that noise would be louder, more frequent and equally over the river. In addition, the residents do not currently approve of the noise level of students (and visitors) to the island. In the spring, track students practice and condition by running the island. This was purported to be an acceptable use of the island space—recreational walking and running. However, they are continually met by at least one or more residents and told they are too loud when they are running. Specifically, their shoes are too loud on the pavement and they should take their practice elsewhere. If this is the level of noise abatement to be met, it is an impossible task as long as the school remains on the island.

Equal in distance to the field are the large tower condominium units directly north of Nicollet Island. At the public hearing, no speakers from these facilities identified themselves as objecting to the project, and thus the objections appeared to come from only one neighborhood to be impacted

It appears that most of the potential impacts have been identified and that the project as proposed should go for further review.



Mary Bulthaus  
3309 Edward Street N.E  
St. Anthony, MN 55418

**From:** Orange, Michael  
**Sent:** Monday, November 28, 2005 3:06 PM  
**To:** 'Cronin, Michael'; 'Galatz, Eric'; Farrar, Rebecca D.  
**Subject:** FW: DeLaSalle EAW comments

Michael Orange, Principal Planner  
City of Minneapolis  
Community Planning and Economic Development  
350 S. 5th St, Room 210 City Hall  
Minneapolis, MN 55415-1385  
Phone: 612-673-2347  
Fax: 612-673-2728  
TTY: 612-673-2157  
Email: michael.orange@ci.minneapolis.mn.us

-----Original Message-----

**From:** Sally Cagle [mailto:scagle@bitstream.net]  
**Sent:** Wednesday, November 23, 2005 4:01 PM  
**To:** Orange, Michael  
**Cc:** Sally Cagle  
**Subject:** DeLaSalle EAW comments

November 23, 2005

Michael Orange, Principal Planner  
City of Minneapolis  
210 City Hall  
350 South Fifth Street  
Minneapolis, MN 55415-1385

**Re: Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility Project, Nicollet Island, Minneapolis**

Dear Mr. Orange,

Thank you for the opportunity to comment on the EAW for the proposed DeLaSalle High School Athletic Facility Project (Project).

## **6. Project description**

The project is described as being on Nicollet Island and within the St. Anthony Falls Historic District. A complete description of the location would include being in Nicollet Island Park, the Central Mississippi Riverfront Regional Park, and the Mississippi National River and Recreation

Area. Having this information at the beginning of the EAW (such as in Project description, b) would be very helpful to the reader.

(page 4, b, paragraph 1)

The EAW states that the field will be shared by DeLaSalle and the MPRB under the terms of the Reciprocal Use Agreement. According to the EAW "...The improvements proposed by DeLaSalle to this lot [Parcel C] consist of replacing the impervious gravel surface with porous pavers and allowing more efficient use of the parking area by organizing and delineating the parking spaces on the site..." while the Reciprocal Use Agreement states that a bituminous surface will be constructed for the "auxiliary parking lot." This area is a rocky, unimproved field that is partially covered by grasses and other plants and that could be restored with native vegetation. No detailed information is given in the EAW on stormwater runoff. Additional research is needed to assess the environmental impacts of the alternative surfaces.

### **Section 9. Land use**

This section does not cover the proposed parking lot on Parcel C, which is needed for the Project's parking. There is an encroachment for the power lines over Parcel C. Do the power lines present any potential environmental hazards, restrictions, or other environmental concerns? The presence or absence of impact should be documented to give a complete picture of the Project.

The information on some residences is out-of-date such the following passages and needs to be updated.

(page 8, paragraph 3)

(page 7)

Paragraphs 1 and 3 differ. Paragraph 1 says "a multi-family residential structure known as Grove Street Flats" while paragraph 3 says "three multi-family residences." Which properties were privately owned in 1983?

The EAW states "Grove Street provides access to two multi-family residential properties, the administrative offices of DeLaSalle High School, and Nicollet Street Bridge." Is the DeLaSalle Christian brothers' residence still on the upper floors of the DeLaSalle administration building? At this time, one or more refugees are also living there. Is this residence used in the light and noise studies the same as the other residences?

(pages 7 and 8)

When did 20 Grove Street change from being a rental property to a "housing cooperative"?

(page 8, paragraph 5)

"Off the Island to the east bank are the new, 6-to-8 floor apartment developments upriver from 1st Avenue, Riverplace downriver, and townhouses and Boom Island Park upriver from the railroad crossing." The "6-to-8 floor apartment developments" are condominium developments, and there are also luxury row houses upriver from 1st Avenue.

## **Section 11. Fish, wildlife and ecologically sensitive resources**

Section 11 omits the impact that developing the proposed athletic fields and associated parking lot, Parcel C, would have on the Mississippi Flyway. The National Park Service reports that “Sixty percent of all North American birds (326 species) use the Mississippi River Basin as their migratory flyway.” Flocks of migrating Palm Warblers, Yellow-rumped Warblers, and Chipping Sparrows have been observed feeding on the proposed site and wintering bald eagles, an endangered species, are seen resting in the riverbank trees. Additional information is needed on the birds and wildlife that use the site to access how the loss of this open space would impact them and the flyway. The cumulative impact of the loss of a few acres of open space here and there can be very significant and should be considered.

(page 9, a)

In response to the request to identify fish and wildlife resources, the EAW states that the site has been developed for urban uses and that “No ecologically sensitive areas or natural areas remain on or near the site.” The attached drawing was prepared in conjunction with the 1996 Nicollet Island Master Plan, and shows wildlife was one of the subjects considered by the planners and the CAC. Both resident and migrant wildlife have and continue to use the area. Additional research is needed to access how the fish and wildlife are affected by the project.

## **Section 13. Water use**

(page 10, second to the last paragraph)

Is there an irrigation system that serves the MPRB parcel? When the trees on that site were planted, the MPRB staff watered them from a tank truck.

## **Section 20. Solid wastes, hazardous wastes, storage tanks**

(page 14, a)

Where do the concessions come from? Will there be a concession stand/building on the site? In the present plan or on an outlot?

## **Section 21. Traffic**

(page 19, Parking)

The EAW states that there is a small lot on the north side of the high school that could be used for athletic field events. Is this lot the area on east side of the DeLaSalle administration building, or is it the semi-circle lot off West Island Avenue? If it is the area beside the administration building, what plans are being made for the buses and cars that normally use it? Is a parking area set aside for the Christian Brothers’ residence? If it is the semi-circle lot, are there plans for additional parking for general park visitors?

## **Section 30. Other potential environmental impacts**

During the construction of the new storm sewers and the resurfacing of the streets on Nicollet

Island, the digging/drilling in the limestone caused the Grove Street Flats building to shake. The City investigated, and steps were taken to eliminate the shaking. Is there any danger that the construction grading or drilling of the proposed project will cause similar shaking of that historic building?

Sally Cagle  
12A Grove Street  
Minneapolis, MN 55401  
612-379-4166

# NICOLLET ISLAND AREA

MINNEAPOLIS PARKS AND RECREATION BOARD

MARTIN & PITZ ASSOCIATES, INC.  
 LANDSCAPE ARCHITECTS • URBAN DESIGNERS  
 1409 WILLOW STREET  
 MINNEAPOLIS, MN 55403

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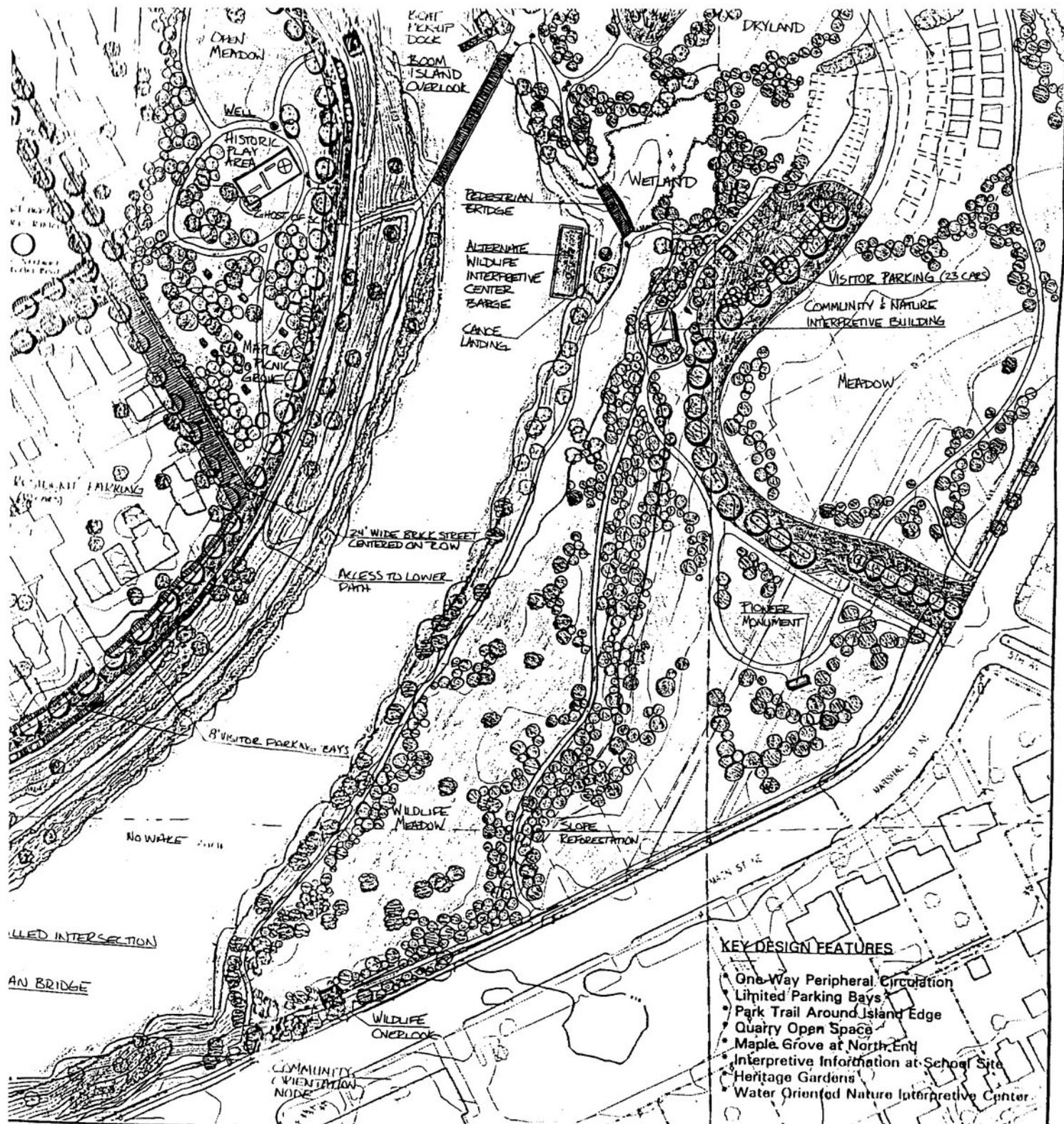
LANDSCAPE RESEARCH, INC.  
 1466 HYTHE STREET  
 ST. PAUL, MN 55108

## KEY

BRICK STREETS	
BRICK SIDEWALKS	
IMPROVED STREETS	
PARKING BAY	
UNIMPAVED DRIVEWAY	
FRONT YARD	
FIVE-FEET PATH & PARK WALK BITUMINOUS WITH REAL COAT	
MEADOW	
WETLAND	
WATER	
WETLAND	

## KEY DESIGN FEATURES

- One-Way Peripheral Circulation
- Limited Parking Bays
- Park Trail Around Island Edge
- Quarry Open Space
- Maple Grove at North End
- Interpretive Information at School Site
- Heritage Gardens
- Water Oriented Nature Interpretive Center



23 November 2005

J. Michael Orange, Principal Planner  
Community Planning and Economic Development  
350 South 5<sup>th</sup> Street, Room 210  
Minneapolis MN 55415-1385

Dear Mr. Orange:

Thank you for your time and consideration. I will list my concerns in the order they appear in the EAW. My concerns are not limited to these items; I attempt to address a few issues which did not receive much prior attention.

**4. Reason for EAW preparation:**

“The City of Minneapolis received a petition requesting the City prepare an EAW for the Project and De LaSalle High School offered to prepare a voluntary EAW on behalf of the City.”

*Is this an impartial and objective study? Would the EAW draw different conclusions if it was prepared by consultants not hired by De LaSalle?*

**5. Project Description:**

Section b: ““The new facility will allow De LaSalle to host home football games and practice for those games on its site for the first time in the school’s 106 year history.”

*I use Section b as an example. Again, I am concerned with the inherent bias built into the document in entirety. The language is subtle but partial to De LaSalle in tone and in fact. (De LaSalle regularly practices on its existing fields on its site.)*

**20. Solid wastes, hazardous wastes, storage tanks**

“Events at the facility will generate solid wastes associated with concessions; food wrappers, paper cups, napkins and plastic and aluminum soft drink containers. De LaSalle will maintain trash receptacles around the Project site and collect, sort and dispose of trash from the facility . . . “

*I observe that despite the availability of trash cans, the drive, sidewalk and grassy areas directly in front of the main entrance to De LaSalle are regularly littered with the kinds of debris described above. Will De LaSalle be compelled to enforce a higher standard of waste removal for the athletic facility than it does for its own main entrance?*

*What about the accumulation of litter on Grove Street and the nearby neighborhood streets and properties?*

## 21. Traffic

*The EAW discusses parking spaces in parking lots but does not address the impact of the athletic field on street parking. Currently, the impact of De LaSalle events using street parking is significant.*

- *Cars are frequently parked in the No Parking zones along West Island Avenue. This is usually on an “extended temporary” basis at the end of the school day or evening event, but many of those cars are unoccupied.*
- *School visitors use restricted street parking along Grove Street for hours at a time with the result of no available parking for residential use. Although residents may have garages or contracts for off street parking, resident guests or service vehicles do not. I do not argue De LaSalle’s right to share the available street parking; my point is that there is not enough available parking. Increased need will overwhelm any possibilities for the residents to use street parking.*

---

I have lived 4 years on Nicollet Island. A business trip to Chicago’s Old Town neighborhood inspired us to find something similar – although on a much smaller scale - in Minneapolis. Our historic buildings and neighborhoods haven’t enjoyed the protection and preservation enhancing historic districts in many other American cities. Perhaps there is another suitable space for an athletic field and Nicollet Island might be left untouched.

Thanks again for your consideration.

Nan Carlson  
6B Grove Street  
Minneapolis MN 55401  
612.331.2841

163 Nicollet St.  
Minneapolis MN 55401  
November 23, 2005

Michael Orange, Principal Planner  
City of Minneapolis  
210 City Hall  
Minneapolis MN 55415

RE: EAW for DeLaSalle Athletic Field

Dear Mr. Orange,

I would like to submit the following comments on the above EAW.

Under Item 6a, the project description, the EAW fails to mention that the project is located in the Central Mississippi Riverfront Regional Park. This is significant because of the large number of people who use the Park, reportedly 750,000 annually. The EAW does not address the impact of the project on the needs and preferences of Riverfront Regional Park visitors. An extensive study would be required to do so. It is unlikely that many Park visitors have a need or desire for an athletic field. The Metropolitan Council's 2030 Regional Park Policy Plan states that "...athletic field complexes are inappropriate for development on regional park lands".

Under Item 7, the area of the proposed parking lot ("Parcel C") is incorrectly given as 0.71 acres. This site is actually three separate tax parcels with a total area of 1.43 acres, according to Hennepin County's website.

Under Item 9, the EAW incorrectly states that, pursuant to the 1983 Agreement, "...certain parcels acquired for the Park were reserved for private use of these public lands". Mention of the 1983 Agreement is of doubtful relevance. In addition, this statement grossly misrepresents the contents of the Agreement and related actions by the public bodies involved, as follows:

- The residential parcels mentioned were not acquired for park use, and were never intended for that purpose. Fee title to these lands was conveyed to the Park Board, without charge, by the MCDA. The MCDA had acquired them from private owners. The Park Board immediately leased them back to the MCDA for redevelopment, pursuant to a 1973 MCDA redevelopment plan which called for restoring the historic buildings on the parcels. The purpose of the lease arrangement was to enable the Park Board to monitor the restoration and use of the historic buildings. As recited in the lease document, the Park Board and MCDA agreed that the historic buildings would be an asset to the adjacent park, which they have proven to be. The Park Board only wanted to make sure that the restoration would be done properly, and that the buildings would be maintained.

- The Nicollet Island Pavilion was originally restored by the Park Board for use as a public building, and was used as such for approximately 20 years. The present lease to a concessionaire dates from 2002. No such concession arrangement was mentioned in the 1983 Agreement, nor contemplated at that time.
- The Park Board lease of the Nicollet Island Inn to a private operator predated the 1983 Agreement, and the Agreement says nothing about it.

A subsequent statement under Item 9 refers to athletic fields' being permitted as a conditional use in residential districts. This again ignores the location of the project in the Regional Park. The Conditional Use process is not an adequate means of addressing the impact of the project on the Regional Park. The appropriate means of doing so would be an EIS.

Under Item 16, the earthwork quantities called for are not given. The answer to this question is thus inadequate and non-responsive. The quantity of earth to be moved for the athletic field would be readily available from DeLaSalle's engineering consultants. Their CAD program would calculate the volume in cubic yards with a few keystrokes.

It is also asserted that porous pavers and subsurface infiltration will provide adequate stormwater management for the proposed parking lot. During the CAC process for the project, the presentations included grading and drainage plans for the athletic field, prepared by engineers, but there were no such plans for the parking lot. I would therefore ask whether this statement is based on actual engineering work or is mere supposition. Among other things, bedrock is very close to the surface in most places on the Island—2 to 3 feet on the present athletic field, according to DeLaSalle's consultants. Would porous pavers and infiltration work under such conditions? Have soil conditions or the depth of the bedrock been investigated on the parking lot site, or any other engineering work done with respect to that site? In the absence of engineering work and actual plans, it is not possible to evaluate the impact of the proposed parking lot.

Under Item 17, the EAW does not address the net increase in fertilizer and herbicide use that would be associated with the athletic complex, as opposed to the present natural meadow state of the Park land.

Under "Designated Parks and Trails", the response includes a good deal of irrelevant information, but fails to mention that the 1996 Master Plan shows a trail connection on the site of the proposed parking lot, part of a system linking Boom Island and Main Street. The area in fact functions as a pedestrian and bicycle trail at present, although not fully developed as laid out in the Master Plan.

The athletic field and parking lot would have significant visual and physical impacts on the present trail use. The visual impact would be that of a suburban-style athletic complex, including a 6- to 10-foot high retaining wall system topped by a railing, and a paved and striped parking lot with necessary guard rails, lights, and signage. Physically, the parking lot development would prevent completion of the trail as shown in the Master Plan. These impacts are not mentioned in the response.

DeLaSalle had representatives on the CAC for the 1996 Master Plan, but they said nothing about a future athletic field. They asked for tennis courts, which were incorporated in the plan. At that time they had a full-sized football field, created by occupying a part of the public right-of-way of Grove Street. Evidently they felt they had received what was contemplated in the 1983 Agreement.

Under “Scenic Views and Vistas”, the response mentions views of the downtown skyline but does not mention views to the east. Although smaller in scale, the eastern view is similar to the western one—a tree-lined river gorge with buildings beyond. The project would have a dramatic impact on the eastern view. The attached image shows an outline of the proposed grandstand superimposed on the view of the eastern river gorge, as seen from a point near the easterly driveway of the residential Nicollet Island Building. As shown, from this location the grandstand would entirely block the view of the river gorge, the trees, and the buildings. DeLaSalle’s consultants have said that the grandstand would be higher than the Nicollet Street bridge.

The grandstand would also be conspicuously visible from the westerly end of Grove Street. It would thus have an impact on the historic Grove Street Flats, becoming part of the setting of that 1875 building. People on historic tours, which occur quite frequently, would not be able to stand and look at the Flats without seeing the grandstand. It would be a jarring incongruity.

Under Item 21, the methodology of the traffic study is inappropriate. Traffic standards for residential neighborhoods should not be used. Nicollet Island is quite different from an ordinary residential neighborhood, in that it is shared with hundreds of thousands of Regional Park visitors. More importantly, the roadways are shared by motor vehicles, horse-drawn carriages, pedestrians, bicyclists, Segway riders, and persons in wheelchairs. This arrangement is not accidental. It was the subject of intense discussion during the 1996 Master Plan process.

Island residents advocated for the shared roadways, and also for the use of paving blocks, both for aesthetic reasons and for their traffic-calming effect. Through NIEBNA (the Nicollet Island – East Bank Neighborhood Association), \$60,000 in NRP money was contributed toward the cost of the pavers. Not everyone believed the shared roadways would work, but in fact they have worked very well. They are an important part of the nineteenth-century atmosphere that draws so many visitors to the Island.

It is possible to get a general idea of the project’s impact by comparing roadways north of Grove Street with the section of East Island Avenue between Grove Street and DeLaSalle Drive. In this area there are no pavers. This block also serves for traffic circulation around DeLaSalle, and is heavily used for parking. As a result, it can be dangerous to walk in the roadway in this block, and sidewalks are badly needed. The project would create similar hazards elsewhere on the Island.

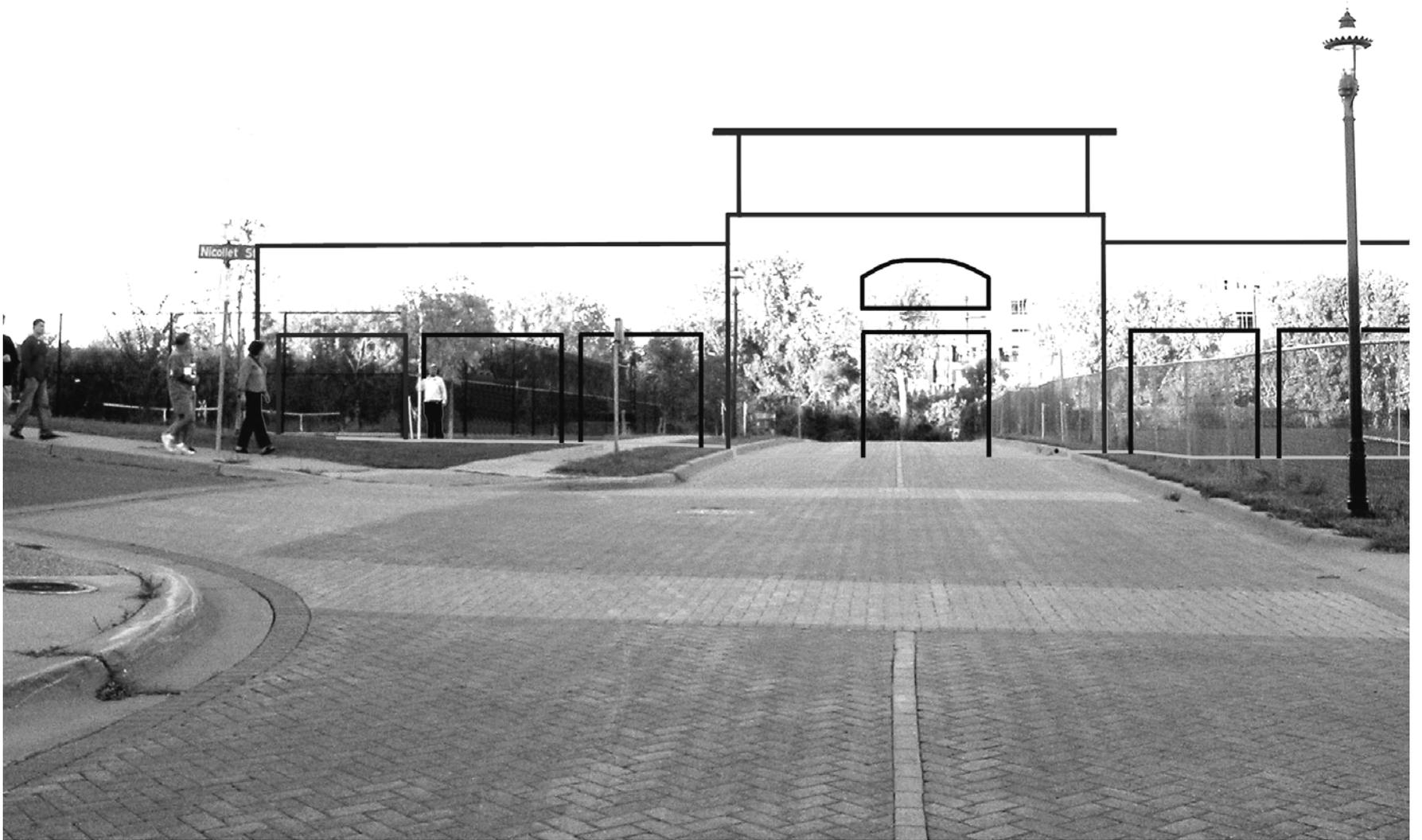
There are probably relatively few examples in the U. S. of shared roadways like those on the Island. Such roadways are fairly common in Europe. Granville Island, in Vancouver BC, has shared roadways. To properly evaluate the impact of the project, traffic standards for shared roadways in similar settings should be obtained and applied.

DeLaSalle has engaged competent architects and engineers, who have made considerable efforts to reduce the visual presence of the project. But its area, bulk, and intended use, in this location, will inevitably lead to impacts that cannot be mitigated. To properly inform officials and the public of the extent of such impacts, it is appropriate that an EIS be prepared.

I appreciate the opportunity to submit these comments, and your work on this process.

Yours,

John Chaffee



Steven M. Christenson  
171 E. Island Avenue  
Minneapolis, MN 55401-1503  
H: 612-379-4524  
W: 651-293-2697

November 14, 2005

J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
Community Planning & Economic Development Department  
City Hall Room 210  
350 S. 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385

**Re: Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis**

Dear Mr. Orange:

### **Introduction**

This letter provides comments on the draft EAW for the proposed athletic facility development project on Nicollet Island within the St. Anthony Falls Historic District in Minneapolis. The EAW appropriately concludes that the proposed closure and demolition of East Grove Street will have an adverse impact on the St. Anthony Falls Historic District. The EAW, however, generally minimizes or dismisses adverse effects of the development project that warrant further investigation. Moreover, the EAW contains incomplete information about aspects of development project that warrant further investigation. These items are addressed below following the sequence of the EAW.

### **Section 6 – Project Description**

The Project Description section appears incomplete. For example, the proposed Reciprocal Use Agreement attached to the EAW as Attachment F states that the development project will include the following elements:

\* \* \*

- Construct a bituminous surface for the “auxiliary parking lot” located adjacent to East Island Avenue and between the First Avenue Bridge and the Burlington Northern Railroad Tracks.
- Landscape the area adjacent to the “auxiliary parking lot.”

\* \* \*

- Relocate and construct at least three (3) tennis court facilities on property selected and owned by MPRB

Tennis Courts. The Project Description in the EAW, however, says nothing about relocation and construction of the three tennis courts. Because this tennis court construction will either be included in the development project or will be a later stage or later component of the development project, the EAW should address this hidden element of the development project. By leaving out the tennis court element of the development project, the EAW inappropriately understates the development project's size and understates stormwater runoff issues and other environmental impacts.

Will the tennis courts be relocated at the south end or north end of Nicollet Island? Along the Mississippi riverbank east of Island Avenue? At the BF Nelson site? On Boom Island? The EAW should be modified to include additional factual information and further investigation regarding environmental impacts of the tennis court element of the development project.

Parking Lot. The EAW indicates that auxiliary parking will be developed on Parcel C. Recognizing that the parking actually "counts" as part of the project is an important step forward, as several presentations before the Park Board and the Park Board's Citizen's Advisory Committee (CAC) downplayed or excluded any recognition of the auxiliary parking proposed on Parcel C on the Mississippi riverbank. Given the location of this parking area directly next to the Mississippi riverbank, however, there is a significant potential for environmental impacts associated with the parking area.

The EAW downplays these environmental impacts by describing the parking lot development as proposed with "porous pavers" that would minimize stormwater runoff. Contradicting these statements is the proposed Reciprocal Use Agreement attached to the EAW as Attachment F. The proposed Agreement describes DeLaSalle's plan for a bituminous parking lot. Again, the EAW should be modified to include additional factual information and further investigation regarding environmental impacts from the parking lot element of the development project.

Concession Stand. The EAW makes no mention of the proposed concession stand to accompany the proposed football stadium. At the Park Board's CAC hearings, a small building for a concession stand was discussed as an integral part of the project. Again, the EAW should be modified to include additional factual information and further investigation regarding environmental impacts from the commercial concession stand element of the development project. While this element may or may not pose potential significant environmental impacts, leaving out this element of the project suggests that the EAW has understated the project's scope in this and possibly other respects.

#### **Section 6.d – Future Stages**

If the tennis court relocation and construction described in the proposed Reciprocal Use Agreement (EAW Attachment F) is deferred for a later stage, this future development project stage should be disclosed and evaluated.

### **Section 7 – Project Magnitude Data**

In addition to the tennis court area excluded from the EAW, there is a question about the size of MPRB Parcel B. The EAW describes this parcel as 1.25 acres in size. By contrast, the enclosed survey of this parcel by Rehder & Associates describes it as ~1.7 acres in size, although the survey appears to include East Grove Street. Does the project extend northward onto the Burlington Northern railroad right-of-way? See enclosed 1892 Foot Atlas.

These basic questions about the project size should be addressed to enable a more reasoned analysis of the project's environmental impacts. Also, the size of the proposed commercial concession stand should be added to the commercial square footage indicated in the EAW.

### **Section 8 – Current Land Use**

On page 8, the EAW notes that the open space parkland within the MPRB Parcel B was recently planted with 1 in. caliper ash and maple trees. The EAW should note that these currently small trees were planted to commemorate the 150<sup>th</sup> anniversary of the University of Minnesota. A brass plaque and granite monument dedicated by then-University President Mark Yudoff memorialize the tree planting immediately northwest of Parcel B. In other words, the value of these trees is greater than the mere timber or lumber value of the trees due to the special significance surrounding their planting.

### **Section 12 – Physical Impacts on Water Resources**

The EAW states there will be no such impacts. Without further information regarding the parking lot proposed along the Mississippi riverbank, it seems speculative to conclude that there will be no impact on the Mississippi River or associated riverbank wetlands. Also, the open space parkland on MPRB Parcel B contains a small area of hydrotropic soils and sedge grasses. This area may or may not be considered subject to the DNR Protect Waters Inventory, but the EAW should investigate and evaluate these potential wetlands or water resources impact.

### **Section 16 – Erosion & Sedimentation**

On page 12, the draft EAW states that a retaining wall “along the railroad right-of-way will be replaced.” This statement may be an error. The stone retaining wall along the Burlington Northern Railroad line is a substantial structure, which has been in place for more than a century and was not discussed for replacement in any Park Board or Park Board CAC hearings. If this very large stone wall structure is to be replaced, the EAW should provide further investigation and analysis of potential environmental and historic resource impacts.

### **Section 19 – Geologic Hazards**

Section 19 does not identify any potential geologic site hazards. The EAW, however, describes plans for at least 4 lighting poles that will be 70 feet tall. These lighting poles will require drilling into the limestone and potentially into the soft St. Peter sandstone under Nicollet Island. Given the particular geological history of Nicollet Island, this proposed drilling warrants further investigation and analysis.

In general, the limestone and soft sandstone in the vicinity of St. Anthony Falls has caused many construction problems and environmental impacts over the years. In 1869, excavation of a tunnel approximately 2,000 feet long under Nicollet Island resulted in a famous incident when the Mississippi River broke through the limestone sheath. This drilling nearly resulted in collapse of the St. Anthony Falls. See L. Kane, *The Falls of St. Anthony: The Waterfall that Built Minneapolis*, pp. 62-80 (1987). More recently, sandstone erosion under the St. Anthony Falls near power plant along the east riverbank required emergency installation of new reinforcing caissons just two years ago. At minimum, the potential environmental impacts from the proposed construction and drilling should be evaluated in the EAW if not preceded by an engineering study.

### **Section 21 – Traffic**

On page 17, the EAW provides traffic data analysis indicating that about 500 vehicles per day utilize East Grove Street and only 300 vehicles per day utilize West Grove Street. In other words, 200 more vehicles per day are using East Grove Street than West Grove Street. These vehicles are going somewhere – most likely the north tip of Nicollet Island via Nicollet Street or to the back of DeLaSalle high school. Yet, the EAW's traffic data states that traffic levels will decrease on West Grove Street (and Nicollet Street) after East Grove Street closes. Instead, it seems more likely that traffic levels will increase on West Grove Street (and Nicollet Street) after East Grove Street closes because West Grove Street will become the only passable route to the north tip of Nicollet Island when trains are present (a common occurrence).

Put another way, the EAW describes the traffic impacts of closing East Grove Street as limited to the traffic associated with DeLaSalle football games. The EAW ignores traffic patterns associated with the 750,000 other annual visitors to Nicollet Island. By focusing just on the football game traffic issues, the EAW understates and fails to properly evaluate the environmental impacts associated with closing East Grove Street.

### **Section 25 – Nearby Resources**

In section 25, the EAW states that the proposed new construction does not appear to have an impact on the Grove Street Flats or the Nicollet Island Residential Area. While it is correct that the proposed construction does not involve demolition of the Grove Street Flats or historic homes in the Nicollet Island Residential Area, the broad statements of “no impact” are incorrect. As noted above, closing East Grove Street will have a significant impact on traffic flow patterns by increasing traffic on West Grove Street in

front of the Grove Street Flats and by eliminating the standard method of approaching the north tip of Nicollet Island when trains are present.

Grove Street is one of two principal east-west streets laid out on the original plat of Nicollet Island surveyed in 1865. Installing a large-scale athletic facility in the small space of Nicollet Island will significantly alter the look and feel of this historic district. The existing collection of houses in the district represents both the spatial arrangement and style of the 19<sup>th</sup> century. The original street layout, including the brick street layout of East Grove Street, is a significant element of the historic district. See enclosed 1885 Hopkins plate and 1892 Foote Atlas plate #3. I am enclosing comments of a prominent local historic preservationist and architect, Robert Roscoe, further describing the impacts of the proposed development project. Because the street layout is part and parcel of the Grove Street Flats and Nicollet Island Residential Area, it is incorrect to conclude that closing East Grove Street has no impact on these historic resources.

### **Section 29 – Cumulative Impacts**

If reconstruction of the tennis court area is deferred to a later phase, the impacts of that project phase should be evaluated.

### **Conclusion**

The draft EAW concludes that closing East Grove Street will have an adverse impact on the St. Anthony Falls Historic District. Given this conclusion, the City of Minneapolis Zoning and Planning Committee should require preparation of an Environmental Impact Statement (EIS) to consider alternatives to the proposed project and to consider methods of reducing adverse historic resource and environmental effects.

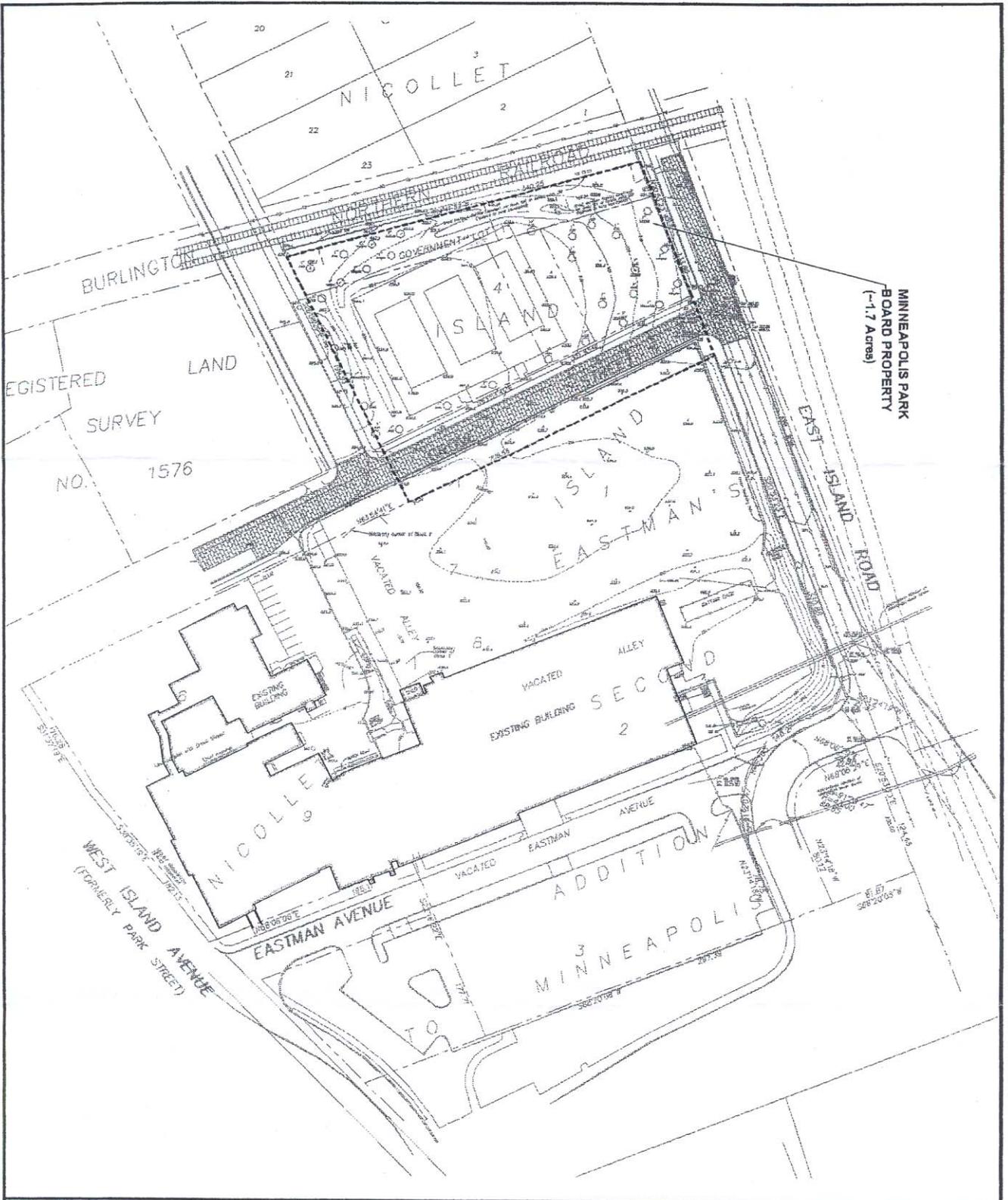
Before proceeding to an EIS, I respectfully request that the City address the incomplete information in the EAW noted above. In particular, the proposed Reciprocal Use Agreement describes reconstruction of 3 tennis courts as part of the development project, but the EAW does not include the tennis court area in the analysis. The EAW states the century-old stone retaining wall along the railroad right-of-way will be replaced, which seems incorrect. Potential geologic impacts associated with field lighting poles and other construction are not adequately addressed. Accordingly, the EAW should be revised to address this incomplete analysis and re-published for comment. To address the entire project in an orderly way, this EAW revision should be completed before proceeding to an EIS. Thank you.

Sincerely,

Steven M. Christenson

Enclosures:

1. Survey by Rehder & Associates (2005)
2. 1885 Hopkins Plate & 1892 Foote Atlas plate 3
3. Robert P. Roscoe correspondence to Park Board (July 25, 2005)



MINNEAPOLIS PARK  
BOARD PROPERTY  
(-1.7 Acres)



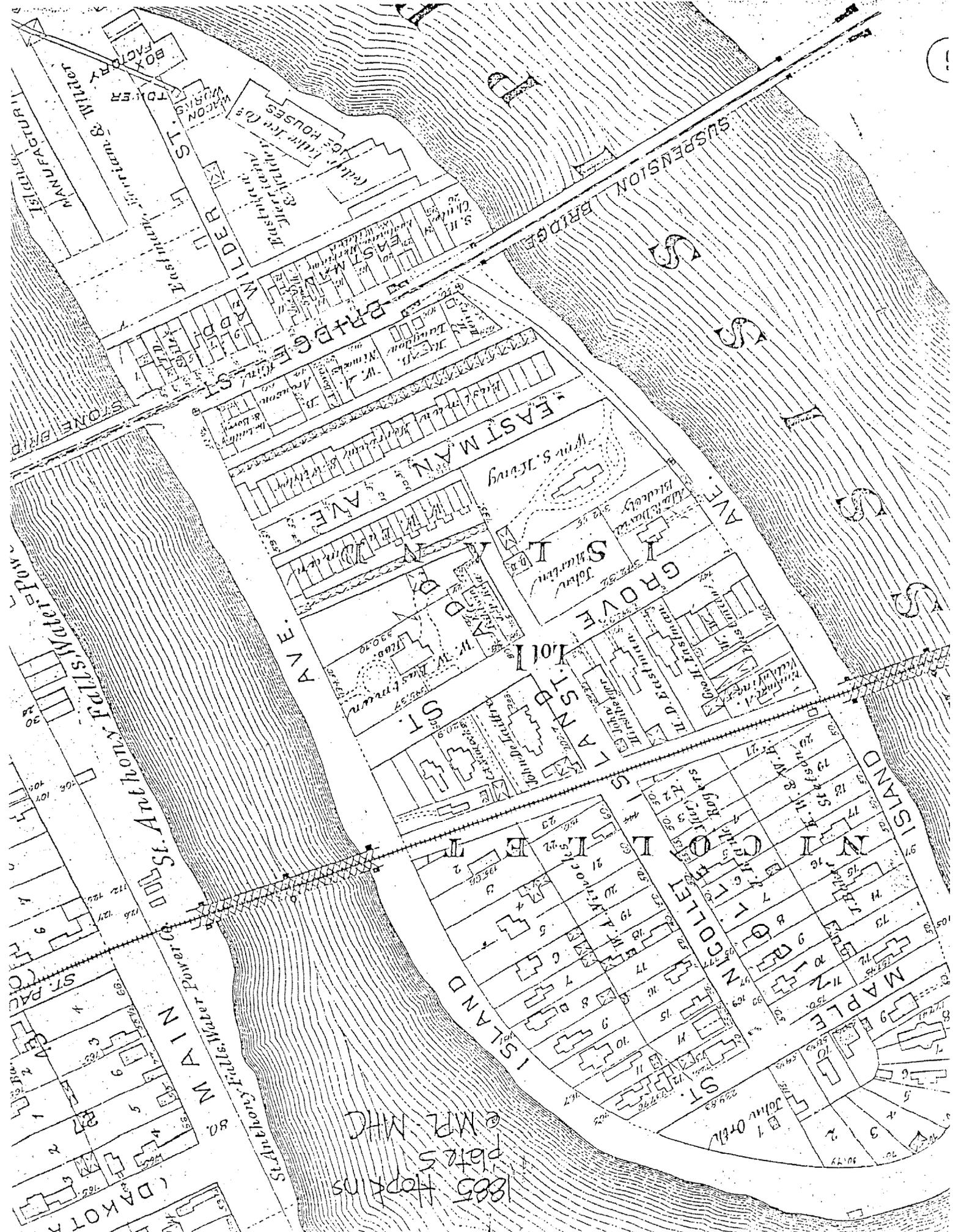
DeLaSalle High School  
One DeLaSalle Drive  
Minneapolis, MN  
55401-1597

-- EXHIBIT A --

TOPOGRAPHIC  
AND BOUNDARY  
SURVEY



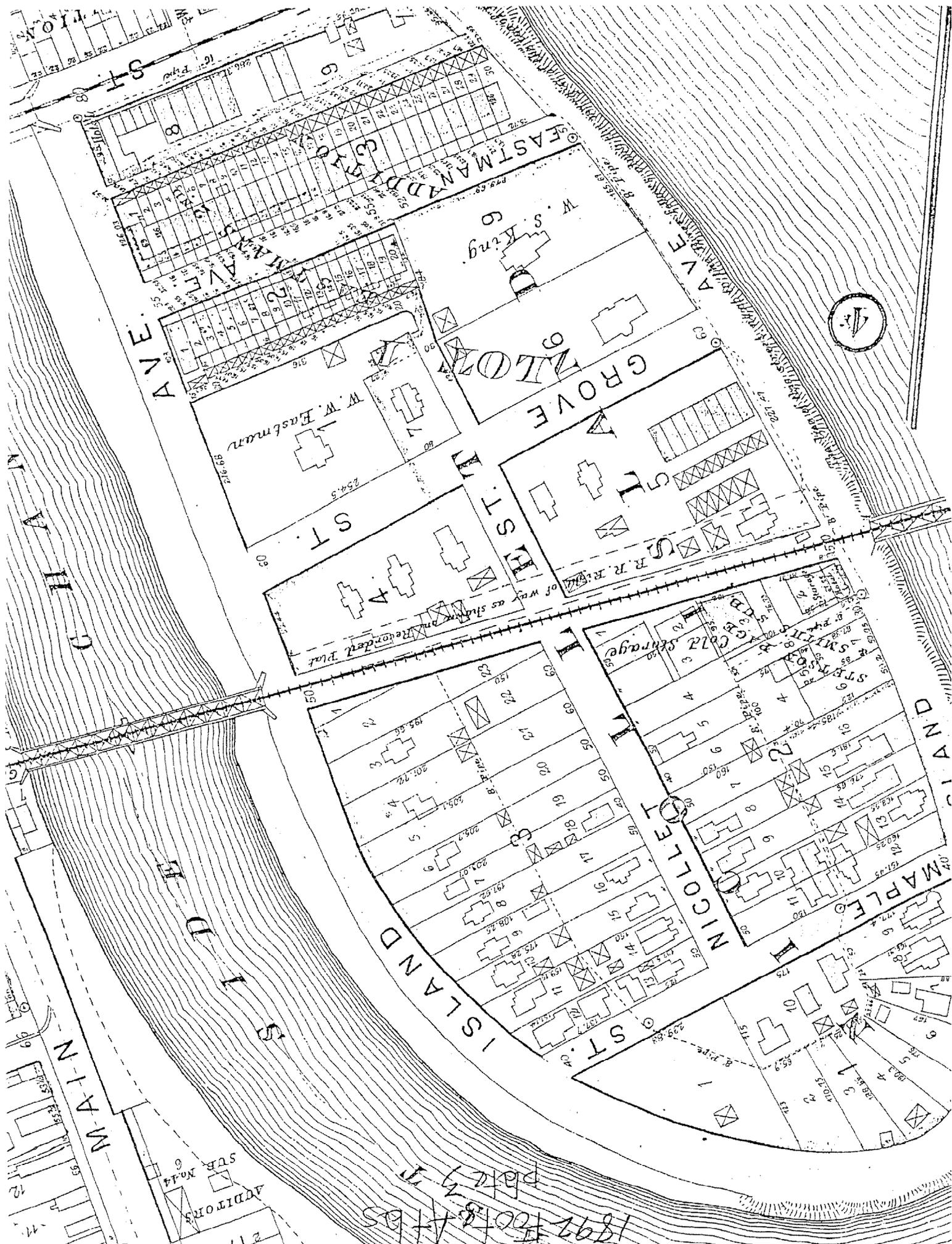
SURVEY COMPLETED BY:  
REHDER & ASSOCIATES, INC.



885 Hopkins  
 plates  
 @ M.R. MHC

John O'Neil

DAKOTA



1899 Foot & A.S.  
page 9

ADDITORS  
SUB No. 4  
6

MAIN

S I D F

I S L A N D

N I C O L L E

I S L A N D

M A P L E

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G R O V E

S T .

S T .

A V E

E A S T M A N

S T .

S T .

From: sandy daly [sanda33@earthlink.net]  
Sent: Wednesday, November 23, 2005 10:49 AM  
To: Orange, Michael  
Subject: EAW on Nicollet Island

Dear Mr. Orange,

Please accept my comments relating to the proposed EAW for the DeLaSalle Project on Nicollet Island. I have lived on the Island since 1990 and am very concerned about parking and pedestrian safety.

Parking for a sports event tends to be oriented toward the entrance to the event. According to the EAW, there are "occasionally" 1150 fans attending DeLaSalle basketball games. (Response to EAW Question 21, subheading Intersection Capacity Analysis at page 19.) Those fans are oriented toward entering the school building by the main doors facing Hennepin, and park accordingly, in the school's lot, or the E. Island lot, or occasionally spilling over into places like under the Hennepin Ave. bridge. In fact I personally have observed instances of illegal parking under bridges during DeLaSalle events.

The proposed stadium grandstand faces Grove and Nicollet, and therefore attending fans would more likely be oriented toward an approach from either of those streets. If so, that would mean more cars parking at the upper and residential end of Nicollet Island. By assuming that the parking for the proposed facility would mimic patterns observed with basketball, the EAW fails to give adequate consideration of possible, even likely, differences in parking patterns. (Response to EAW Question 21, subheading Parking at page 19.)

The same unsubstantiated assumption underlies the conclusion that there is "ample capacity to disburse the traffic once it leaves the parking lots." (Response to EAW Question 21, subheading Intersection Capacity Analysis at page 19.) The EAW needs to address the likely possibility that fans will park on the streets of the upper island and consider the impact that will have on traffic patterns and public safety. This potential impact on the residential neighborhood is ignored in the EAW response to Question 25 (Nearby Resources), subheading Nicollet Island Residential Area at page 25. Because this potential impact coupled with the proposed street closure in the St. Anthony Falls National Historic District presents a potentially significant environmental impact, please require preparation of an Environmental Impact Statement (EIS) to evaluate the alternatives to this project location that would pose less impact.

Thank you for your consideration of my comments.

Very truly yours,

Sandy Daly

167 E. Island Avenue  
Minneapolis, MN 55401  
612.331.4527  
sand33@earthlink.net

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**From:** Mr. Matthew P. Dreon [matthew.p.dreon@gmail.com]

**Sent:** Saturday, November 19, 2005 9:51 AM

**To:** ourbeautifulriver@mac.com

**Cc:** Orange, Michael

**Subject:** Friends of the Riverfront

Friends of the Riverfront,

I writing to tell you that I think opposing the DeLaSalle stadium is ridiculous and arrogant and that I'll have no part in it. That school has been in the neighborhood for decades. I have lived here exactly 13 months. If anything, they should be opposing my presence.

The kids there deserve a stadium on campus. The sounds of the game and the fans, the traffic, etc. are simply part of living in an urban area, and in my mind will add to the unique fabric of the neighborhood . To expect that island to be a silent oasis is unrealistic. If you want silence and river views, you need to move about 100 miles north.

Matthew Dreon

150 2nd St. NE #111

Minneapolis, Mn 55413

**From:** Suzanne Durkacs [sdurkacs@umn.edu]

**Sent:** Wednesday, November 16, 2005 6:48 PM

**To:** Orange, Michael

**Subject:** Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis

**Re:** Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis

Dear Mr. Orange:

This letter relates to the draft EAW for the proposed athletic facility development project on Nicollet Island within the St. Anthony Falls Historic District in Minneapolis. My comments relate to three concerns:

- Preservation of open space and public parkland
- Preservation of historic and cultural resources
- Evaluation of the entire project, rather than just a portion of the development project

The proposed development would turn over public parkland and open space to the Diocese of St. Paul for use as a private athletic facility. This use is inconsistent with the Master Plan adopted for Nicollet Island by the Minneapolis Park Board in 1996, which contemplated public open space and passive park use of this area on Nicollet Island. With Metropolitan Council funding, the City bought the relevant parkland for more than \$1 million and designated this parkland along the Mississippi River as "open space." The public interest in preserving this particular natural resource was recorded in a restrictive covenant. Because the proposed development would violate both the restrictive covenant and the 1996 Master Plan, the EAW should conclude that these actions require an Environmental Impact Statement (EIS) to evaluate alternatives.

Nicollet Island is a unique cultural resource, where visitors can still feel the experience of living in Minneapolis a century ago by walking on brick streets, viewing 1870s vintage homes, and seeing the street layout from 1865. The proposed development would change the character and feel of Nicollet Island into an athletic complex theme park. Because the proposed development would violate Minnesota's and Minneapolis historic preservation guidelines, the EAW should conclude that these actions require an EIS to evaluate alternatives.

The EAW contains incomplete information about aspects of development project that warrant further investigation. For instance, the EAW fails to address the location or impacts of the three tennis courts described in the Reciprocal Use Agreement attached to the EAW. The EAW also fails to adequately address the proposed bituminous auxiliary parking lot east of East Island Avenue and adjacent landscaping, which would be directly next to the Mississippi Riverbank. Environmental impacts of potential future project phases should be addressed now in the EAW process, before the project is approved.

On a final note, it is important to remember that the EAW is intended to capture and evaluate all of the potential environmental impacts before the project proceeds, so that impacts can be minimized at the

design stages. The draft EAW comments that historic preservation and other plan conformance issues must be addressed later by other governmental bodies. This is wrong. In *Trout Unlimited, Inc. v. Minn. Dep't of Agri.*, 528 N.W.2d 903 (Minn. App. 1995), the Minnesota Court of Appeals ruled that future regulatory controls to mitigate impacts cannot be relied on to conclude that an EIS is unnecessary. Instead, environmental impacts of future project phases (such as the tennis courts, historic preservation impacts, etc.) need to be addressed in the EAW to get the facts on the table for a proper review

Please require preparation of an EIS to consider alternatives to the proposed project and to consider methods of reducing adverse environmental effects. Thank you.

Sincerely,

Suzanne J. Durkacs

2632 Buchanan Street NE  
Minneapolis, MN 55418  
612.788.0389

I have also sent a hard copy to your address.

**From:** Katharine Fournier [kfournier1@mn.rr.com]

**Sent:** Tuesday, November 22, 2005 3:09 PM

**To:** Orange, Michael

**Subject:** DeLaSalle EAW comments

Dear Mr. Orange,

Although we do not live on Nicollet Island we often walk there and we feel connected to Nicollet Island and its central position in the history of Minneapolis, as do many residents of Southeast Minneapolis, location of Minneapolis' earlier twin, the former town of St. Anthony (whose heart was Nicollet Island).

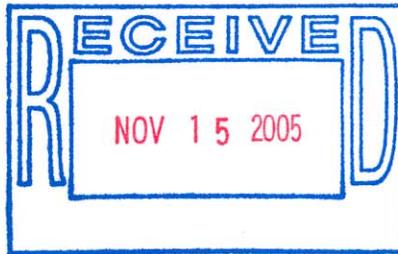
While DeLaSalle may be entitled to some sort of playing fields on the island by the 1983 agreement, the current plans seem excessively large and out of character with the history and the historic presence of Nicollet Island. In fact DeLaSalle has already built a playing field for football in accordance with the 1983 agreement. The current field seems much more in character with other development on the island, than the 25-foot high stadium which is now proposed.

The construction of this visual and traffic impediment seems a drastic solution for DeLaSalle's sentimental desire to hold four or five home games each year. It is quite common for city schools to play on borrowed fields or joint fields (such as Parade Stadium). We do not see that it is a great hardship for DeLaSalle to continue to do this.

Thank you for the opportunity to comment on the EAW.

Sincerely,

Katie and Rick Fournier  
912 18th Avenue SE  
Minneapolis, Minnesota 55414  
612/331-5615  
[kfournier1@mn.rr.com](mailto:kfournier1@mn.rr.com)



### The DeLaSalle Stadium Project

As a citywide stakeholder, I have attended all four CAC meetings. It is apparent to me that DeLaSalle, like many other institutions and private schools, has reached a point in its existence where its needs are outgrowing its site.

The DeLaSalle Stadium Project is a shoehorn project. That is, it is forcing itself onto a site that has multiple limitations, restrictions and problems. It is my observation that the DeLaSalle Stadium Project is not an appropriate project for Nicollet Island.

DeLaSalle should be exploring other alternatives to accommodate its growth.

Arlene Fried  
1109 Xerxes Avenue S.  
Bryn Mawr Neighborhood  
11/15/05

Jan Hively  
(Janet M. Hively, Ph.D.)  
93 Nicollet Street, Nicollet Island  
Minneapolis, MN 55401  
612-379-4124  
[HIVEL001@umn.edu](mailto:HIVEL001@umn.edu)

November 19, 2005

To: **Michael Orange, CPED**

Re: **EAW for DeLaSalle Football and Soccer Stadium**

Thank you for this opportunity to comment on the Environmental Assessment Worksheet. As I stated at the review session last Tuesday night, I have five concerns:

- **Park Board use.** The analyses focus on the impacts of DeLaSalle's use of the stadium. My understanding is that the Park Board will be able to use the stadium when DeLaSalle is not using it. It's important to report on the impacts of the Park Board's use. This will be an attractive site where a lot of football and soccer teams would like to play. The Park Board has dramatically expanded its rentals of recreation space. It's logical to expect that the Park Board will maximize its rentals of the DeLaSalle stadium. The EAW should take the impacts of Park Board use into account.
- **Tennis Courts.** My sense is that the conditions of the 1983 DeLaSalle & Park Board agreement have long ago been met because DeLaSalle now has a football field and tennis courts. Now, the plan for a football stadium would wipe out the tennis courts that were constructed in the late '90s. The EAW doesn't say anything about how the 1983 agreement's guarantee of tennis courts will be met. There apparently is no plan for relocating the courts??? If I were a DeLaSalle parent of a student who doesn't play on a soccer or football team, I would be concerned about wiping out the possibility of teaching a lifetime sport.
- **Grandstand.** The drawing shows a 25 foot high grandstand with its entrance at the end of the remaining half of Grove Street. This is a street that is often crowded now with school buses and Christian Brothers visitors and residents of the Kerwin Flats and Grove Street Flats. The EAW should talk further about the visual impact of the grandstand from the west end of Grove Street, and about the traffic associated with the opening to the grandstand.
- **Retaining Wall.** I believe that the cut stone retaining wall adjacent to the RR track dates back to the first RR crossing of the Mississippi River and is thus an important element of this historic site.
- **Pedestrian Use of East Island Avenue.** By far the heaviest recreational use of Nicollet Island involves pedestrians walking, biking, pushing strollers, riding segways, riding in horse-drawn carriages, and running between Boom Island and

the Main Street Bridge along the river edge trail and East Island Avenue. I wrote a couple of letters to DeLaSalle and the Park Board during the '90s complaining about the fact that there are no sidewalks on either side of East Island Avenue from the RR tracks to the Hennepin Avenue Bridge access road. The roadway is always a dangerous route for pedestrians – particularly when there is a special event at the Pavilion or DeLaSalle and cars line East Island Avenue and fill the parking lot between East Island Avenue and the river. Often, three kinds of pedestrians move abreast along the roadway between the cars. This is dangerous and will be increasingly dangerous if the stadium development plan goes through. By the way, a representative from DeLaSalle told me at a meeting that they had not responded to my letters because they did not want to accept liability. The representative said that the Park Board had promised to build a sidewalk on the DeLaSalle side of the roadway but hadn't done so. The EAW should focus on pedestrian access and risk along East Island Avenue.

Your patience at the meeting was admirable, Michael. I felt proud to be a resident of Nicollet Island and the City of Minneapolis by your competent receptivity and by the astute and articulate comments from my neighbors.

We'll look forward to seeing the revised worksheet.

Best regards,

Jan Hively

Lisa C. Hondros  
171 E. Island Avenue  
Minneapolis, MN 55401-1503  
612-379-4524

November 22, 2005

J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
Community Planning & Economic Development Department  
City Hall Room 210  
350 S. 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385

**Re: Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility  
Development Project, Nicollet Island, Minneapolis**

Dear Mr. Orange:

This letter provides comments on the draft EAW for the proposed DeLaSalle athletic facility on Nicollet Island within the St. Anthony Falls National Historic District in Minneapolis. The EAW rightly concludes that the proposed closure and demolition of East Grove Street will have an adverse impact on the St. Anthony Falls National Historic District. The EAW, however, fails to consider the significance of this closure in the context of the 1996 Master Plan governing development of Nicollet Island.

In 1996, the Minneapolis Park and Recreation Board approved a Master Plan to govern development of Nicollet Island and the B. F. Nelson site. Years of work led to the creation of this Master Plan prepared by Martin & Pitz Associates, Landscape Research and Schoell & Madison Engineers, including the contributions of a Citizens Advisory Committee (CAC) which met multiple times over a three and one half year period. The CAC included members representing recreational and historical concerns, as well as representatives from abutting neighborhoods, DeLaSalle High School and nearby businesses.

The EAW refers to the 1996 Master Plan in answer to Question 25 under the heading "Designated parks, recreation areas or trails." The EAW accurately sets forth the seven objectives of the Plan, but then ignores their implications for the proposed athletic facility. Instead the EAW focuses on a clause from a 1983 agreement that was arguably fulfilled after the City granted the Diocese of St. Paul (DeLaSalle High School) an encroachment of Grove Street in 1984 to allow for construction of a regulation size football field, and later the Park Board built three tennis courts on adjacent parkland. The 1996 Master Plan is the most current document governing development of Nicollet Island, and the EAW fails to address adequately key elements of the Plan relating directly to the proposed project.

For example, the proposed demolition of Grove Street is in direct opposition to Objective Number 7: "Provide for conservation and appropriate rehabilitation of significant historic sites, structures, and buildings." The importance of preserving the original street plan is emphasized in the Master Plan.

The streets of E. and W. Island Avenue, Maple Street, Nicollet Street, Grove and Eastman Avenues are part of the Nicollet Island Addition surveyed in 1865 by Franklin Cook. The original intentions of the land developers and the surveyor are visible and the multi-lot grid plan attests to the intended urban character of the area. The railroad tracks which were built across the the [sic] island in the 1880s determined the character of some nearby parcels but did not deter W.W. Eastman and others from building large and costly houses. (page 5) [Please

note that in Figure 12 on page 15 of the Historic Resources Survey submitted with the EAW, you will find a photo of such homes built on the part of Grove Street that would be replaced with the proposed athletic facility.]

The Master Plan states that design of new development should “[r]ecognize the historical pattern of land use” on Nicollet Island (page 11). In keeping with this guiding principle, the Master Plan calls for “[p]reserv[ing] the integrity of the original (1866) street plan of the island.” (page 11) The proposed project would destroy the historic street plan.

The EAW also fails to consider the full implications of Master Plan Objective Number 5: “[p]reserve and enhance the island’s natural landscape character.” The Plan describes the existing landscape of the open space that would be taken for the proposed facility:

Several open areas, the site of former industries, now exist at the center of the island. The rough topography and emergent vegetation allows for potential development of interesting park areas. (page 8)

Further, the Master Plan directs that public improvement should be at a “scale appropriate to the structures and spaces of the island.” (page 11). Destroying a 150-year-old street pattern and natural landscapes for construction of a suburban style athletic facility is again contrary to principles clearly stated in the Master Plan. In fact, nothing in the 1996 Master Plan contemplates development of the type proposed here. To the contrary, Design Principle 6 underscores the core value of preservation by limiting active recreation space to “where it complements the historic pattern of land use.” (page 11)

The EAW fails to address significant adverse impacts the proposed project would have on the historic district as expressly defined in the governing Master Plan and is therefore incomplete. I urge you to request preparation of an Environmental Impact Statement (EIS) to consider alternatives to the proposed project and to consider methods of reducing the significant adverse impact on the historic street plan and landscaping envisioned by the Master Plan. I attach a copy of the Master Plan to this letter for your information.

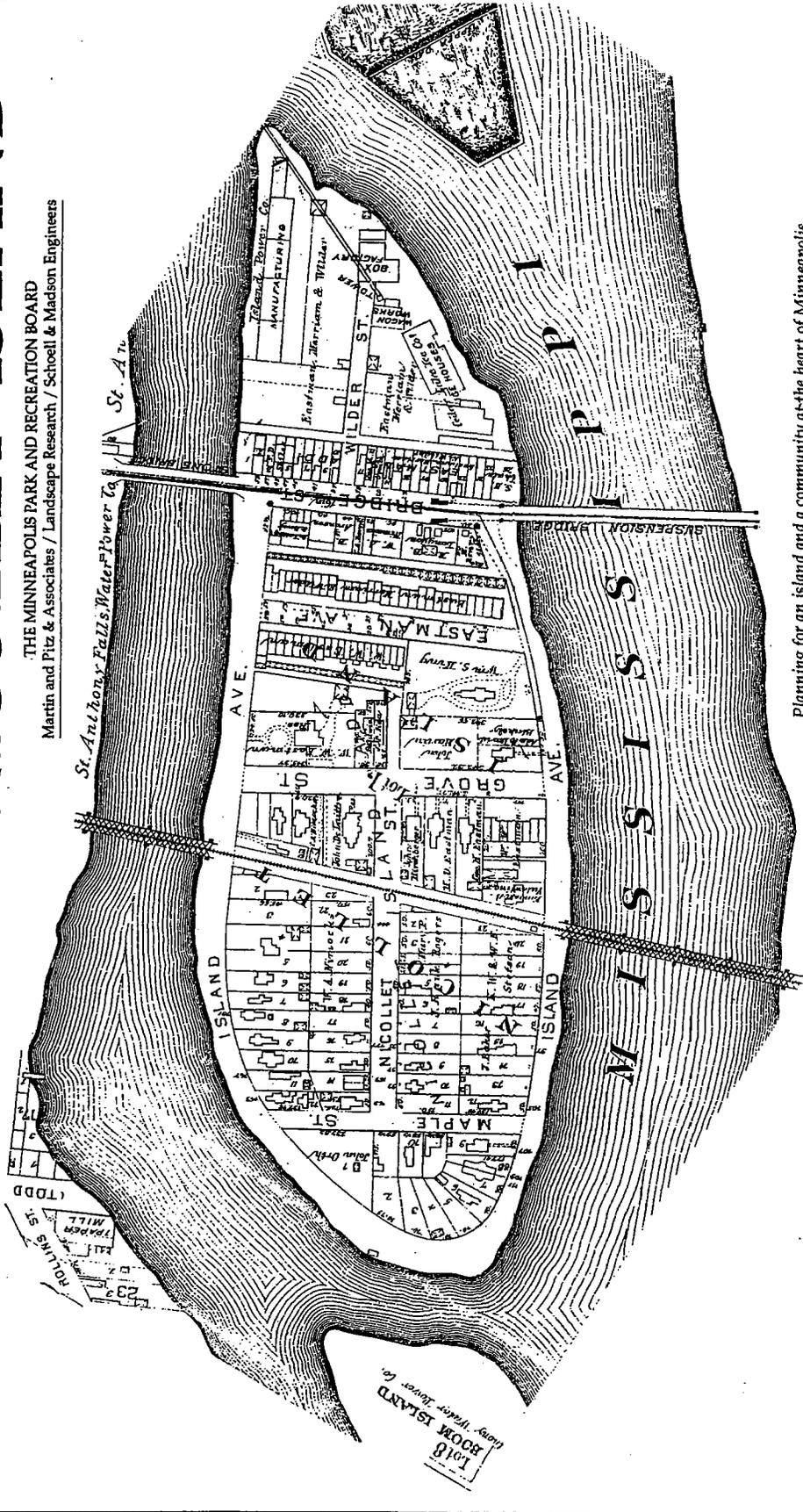
Thank you for your work on this matter.

Very truly yours,

Lisa C. Hondros  
Enclosure: Nicollet Island Master Plan (1996)

# NICOLLET ISLAND

THE MINNEAPOLIS PARK AND RECREATION BOARD  
Martin and Pitz & Associates / Landscape Research / Schoell & Madson Engineers



Planning for an island and a community at the heart of Minneapolis

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All historic photographs are from the collections of the Minnesota Historical Society.  
Cover: 1885 Map of Minneapolis.

**The Nicollet Island Master Plan**

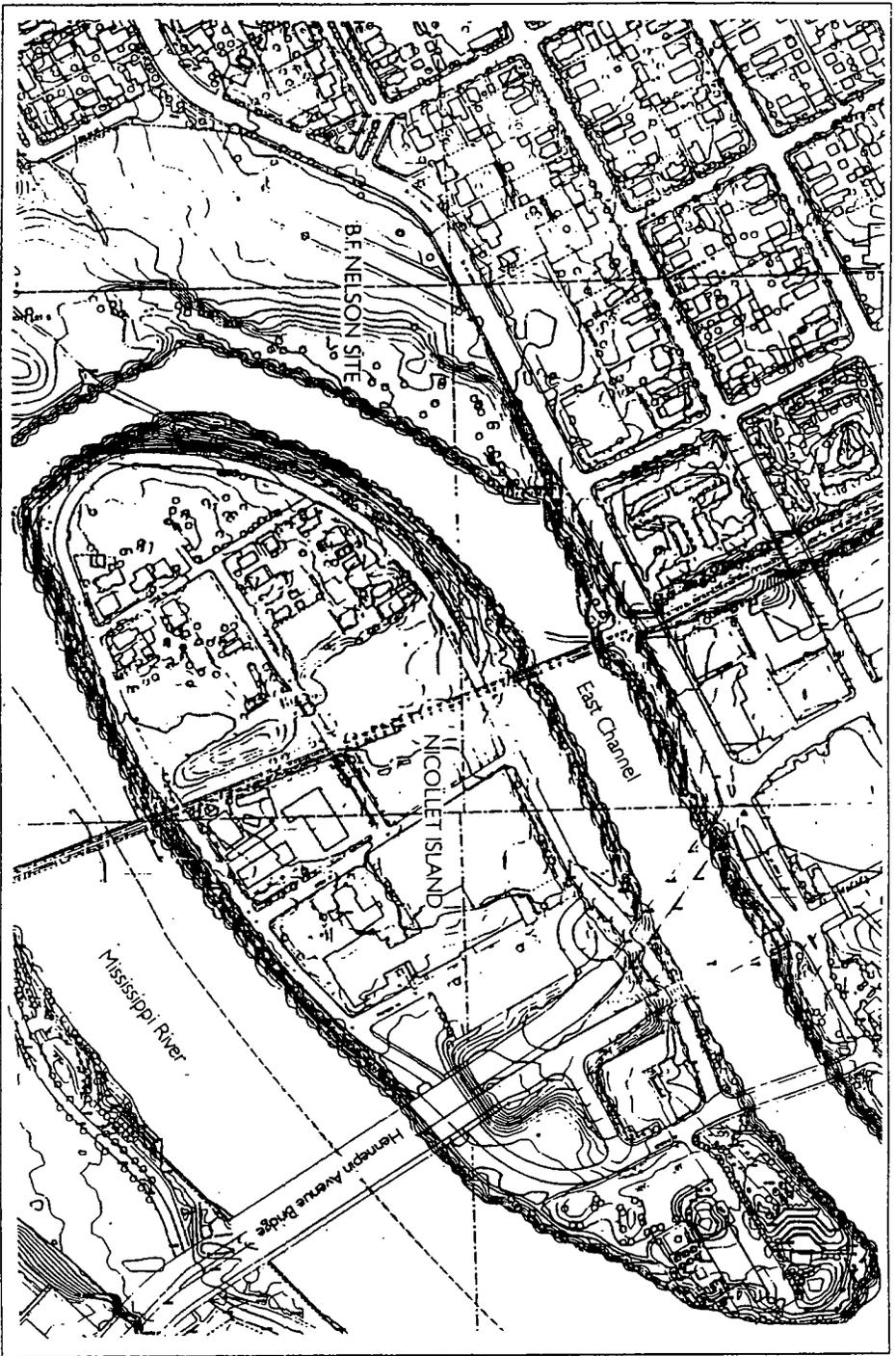
prepared by

**Martin & Pitz Associates  
Landscape Research  
Schoell & Madson Engineers**

for the

**Minneapolis Park and Recreation Board**

**1996**



A topographical map of Nicollet Island and the adjacent B.F. Nelson site.



There is no other place like Nicollet Island in the Twin Cities, and few places like it anywhere else. Resting mid-point in the Mississippi River at the heart of Minneapolis, its southern tip lies only a few hundred feet from St. Anthony Falls.

The largest of the three remaining Minneapolis islands, Nicollet was one of at least six islands present at the time of earliest Euro-American settlement near the falls. From here, Native Americans and early European explorers had a great vantage point for viewing the often thundering precipice downriver. The island is named for Joseph N. Nicollet (1783-1843), a French geographer who explored the Upper Mississippi in 1838 and 1839.

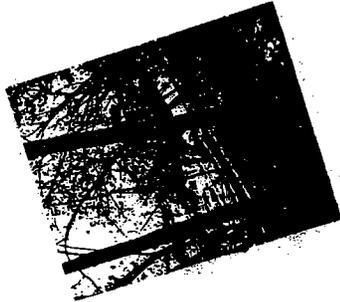
Since the late 1860s, Nicollet Island has supported a variety of industrial uses related to milling and water power generation. For over a decade longer it has been a residential community. The coexistence of residential, commercial, industrial, and institutional uses is a distinctive feature of its past, and the present development of recreational facilities meshes well with the history and spirit of the island.

This tradition of diverse land uses provides a foundation for the premises of this master plan. The plan provides for strengthening the residential community at the northern (upper) end of the island while providing opportunities for visitors to explore the perimeter of the island and to experience the river from a mid-stream vantage point.

This master plan for Nicollet Island and the B.F. Nelson site immediately to the northeast was developed by Martin & Pitz Associates, Landscape Research, and Schoell & Madson Engineers with the assistance of local residents and the Technical Advisory Committee appointed by the Minneapolis Park and Recreation Board. During the fall and



John Maxwell House  
93 Nicollet Street, 1874



winter of 1992 and 1993, the design team and Minneapolis Park and Recreation Board staff met with island residents to review project analysis, planning principles, and concept alternatives for circulation, land use, and the design character of improvements to the island. In early March 1993, the final master plan was approved by residents and the Minneapolis Park and Recreation Board began securing funds to implement Phase I development.



Objectives of the Plan

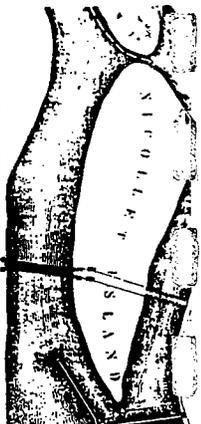
1. Identify and understand the authentic components of the island's character: natural, environmental, historical, and cultural;
2. Provide visitors of all ages, backgrounds, and physical abilities with a variety of recreational and educational opportunities;
3. Reinforce the residential character of the upper island with improvements sensitive to the historic character of the area as well as the daily lives of residents;
4. Improve the image, legibility, and accessibility of the island as a key feature of the river and urban landscape;
5. Preserve and enhance the island's natural landscape character;
6. Recognize and interpret Nicollet Island's important role in the prehistory, settlement, and development of Minneapolis and the region;
7. Provide for the conservation and appropriate rehabilitation of significant historic sites, structures, and buildings.

The 40-acre landform rises approximately 15 feet at its center. In 1853, one observer noted that its slope was "rounded as if by the hand of art which seems to be waiting for a handsome man-sion." The island was then covered with elm and sugar maple, but much of the stand was cut down in the first years of permanent settlement.

The northern tip of the island terminates in a rocky bluff, while the southern tip makes a more gradual descent to the water. Unlike other nearby islands which were reshaped (or completely removed) as waterpower was developed around St. Anthony Falls, the perimeter of the island has remained relatively intact. The natural character of the island is especially evident at the northern tip, where there has been little filling or excavation. The natural caves formed in the underlying limestone and sandstone were used by nineteenth-century brewers for cold storage and later by mushroom growers.

In the early settlement period, the southern half of the island was devoted to agricultural and industrial use, beginning with the establishment of a limestone quarry in the early 1850s. A plant nursery was operated by Rufus P. Upton here in the 1850s. After a series of waterpower and transportation improvements—including the wooden suspension bridge crossing to the west side of the river in 1854 and the construction of the Island Power Building in 1879—the island attracted a variety of industries. Two grist mills, a furniture factory, a stair and box manufacturer, and a boiler works became part of the busy saw and flour mill district gathered near the falls. A fire on August 13, 1893 destroyed a number of industrial buildings on the southern portion of the island and skipped north as far as Boom Island.

The construction of houses on the tract north of Grove Street began in the 1850s. Elegant, expensive residences as well as modest dwellings were built during the next fifty years. The residential



Nicollet Island as shown on the 1856 Map of Minneapolis.

limestone rowhouses and large single-family residences were built below the tracks in the 1870s, while a collection of middle-class and worker's houses were located above the quarries. The National Register of Historic Places nomination for the area notes that between 1867 and 1890, occupations of island residents included a fresco and portrait painter, a confectionery owner, a jeweler, a coachman, and several real estate speculators. John Delaitte, W. W. Eastman, and W.S. King, who built houses between 1873 and 1878, were among the island's most prominent residents.

An early commercial district gathered along Bridge Street (Hennepin Avenue) began with a variety of frame stores and hotels. By the turn of the century, most buildings were replaced by larger ones housing stores and small factories. The entire street was cleared in the 1970s.

Despite the natural river setting, early Nicollet Island residents were surrounded by a noisy industrial scene. Logs and lumber were piled near the sawmills, and the whine of the saws competed with the roar of the falls. By the early 1880s there were 23 mills and other industries along the west side power canal. However, between 1920 and 1940, many west side mills burned or were razed. The last sawmill closed in 1921, and by 1930 the lead in the flour milling industry was taken by Buffalo, N. Y. As industry declined, the river banks again became tree-lined and brush-covered. Under the vegetation remained tailraces, canals, building foundations, and other evidence of the activity of the previous century.



Nicollet Island in 1857, with some of its remaining cover of elm and sugar maple. Swedish visitor Fredrika Bremer wrote in 1853 of her visit to the island: "we drank tea on a considerable island... at a beautiful home, where I saw comforts and civilization, where I heard music, saw books and pictures such like in court, as might be met with on the banks of the Hudson."



Nicollet Island in 1873. From the Panoramic View of Minneapolis. Bridge Street, later E. Hennepin Avenue, supported several generations of stores and shops despite a fire in 1872. Clearance of the avenue began in the 1960s.

The vast lumber regions of Northern Minnesota are directly penetrated by the Mississippi and its numerous tributaries and through these natural and convenient channels millions of the finest pine logs are yearly floated to the falls. Here they are easily and safely returned by the means of booms and the advantages furnished by the somewhat remarkable and certainly very convenient location of Nicollet Island, just above the cataract.

Daniel Hudson, Summary Statement of the General Interest of Manufacture and Trade Connected with the Upper Mississippi (1862).

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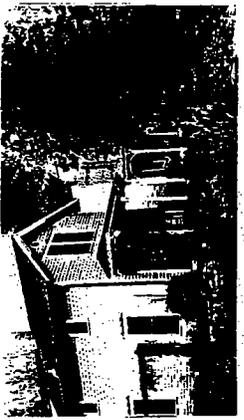
1878 Nicollet Island and the 1878 stone-towered bridge.



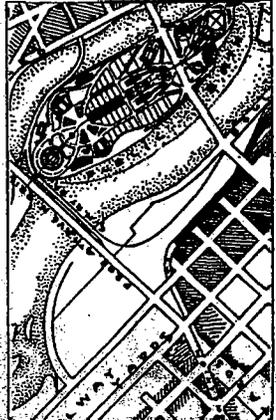
1900: The Colonel William S. King House, on the site of the present DeLaSalle High School.



1900: The island as developed at the turn of the twentieth century.



1996: Nicollet Street one view today.



The Nicollet Island portion of Minneapolis City Beautiful Proposed and Devoted to its Citizens by Jager, Edwards, Straus, Hadden, Architects and Engineers, 1906.

Hennepin Avenue bridge did not call for preservation of remnants of the commercial district remaining on the Island along E. Hennepin Avenue. The area was considered blighted and became the subject of new studies such as one by Barton Ashman Associates in 1964. Their report, "St. Anthony Falls and Nicollet Island: Landmarks at the Continent's Heart," called attention to the historic aspects of the island. Over the next decade, more planning efforts resulted in the dedication of a Bicentennial Park at the southern end of Nicollet Island. The island's housing was also studied in plans such as "Barriada: Rehabilitating the Mississippi River Bank" (1977) which examined the needs of Island residents.

Nicollet Island has attracted the attention of planners for over a century. Since 1905, when the Jager Plan showed an elaborate park scheme, and 1917, when the Plan of Minneapolis by Edward Bennett declared that "the manifest destiny of Nicollet Island is to be a park," the future of public space on the island has been scrutinized many times. However, it has also discussed the potential of the island as a central portion of the Minneapolis downtown. The island is large enough to accommodate a variety of uses.

The restoration of the twenty-one houses standing at the northern tip of the island, the redevelopment of the former William Bros Boiler Works (1893), and the integration of the river has brought dramatic and positive changes. Daily, many new visitors, residents, and workers enjoy Nicollet

In 1979, the Park Board received ownership of the Bicentennial Park from the City of Minneapolis. In the following decade, planning and development of the island focused on mixed land uses with an emphasis on recreation and historical interpretation.

The restoration of the twenty-one houses standing at the northern tip of the island, the redevelopment of the former William Bros Boiler Works (1893), and the integration of the river has brought dramatic and positive changes. Daily, many new visitors, residents, and workers enjoy Nicollet

Island. This increased demand placed on public park lands has highlighted the need for a comprehensive master plan. Existing streets on the island are in need of repair. Street furniture and lighting to provide safe and comfortable streets is currently lacking. A system of interpretive signs describing the island's natural and human history as well as overlooks situated at prime viewing points at the river's edge is also desired. Finally, it is important to define the limits of public and private space at the northern tip of the island to allow the public to enjoy the island while ensuring the privacy and security of residents.

## A NICOLLET ISLAND TIMELINE

Nicollet Island has been among the most studied features of the Minneapolis riverfront. Fires, urban renewal, and changing land use and demographics have contributed to the fragmented pattern evident on the island today. However, this land use fragmentation and diversity has been a standard feature of the island landscape since its earliest development.

Of the islands which could once be counted between the Falls of Saint Anthony and Boom Island, Nicollet Island retains the greatest degree of landscape integrity. As noted previously, its perimeter outline is quite intact, and the elevation of the land, particularly at the north, is relatively undisturbed. In 1862, an early observer, David Headon, reported that the island then had "... a commanding elevation above the high water mark" and that it was formed "of rock or massive layers of stone ... all being covered to the depth of 3 or 4 feet with a rich and luxuriant soil. A magnificent grove of native trees surmounts all, giving the whole island an appearance of unsurpassed beauty."

Reports of forest cover of sugar maple and elm are substantiated by early photographs. An 1850s photo suggests that a perimeter planning might have been attempted by white settlers, but the pattern of trees could also have been the result of selective cutting.

The streets of E. and W. Island Avenue, Maple Street, Nicollet Street, Grove and Eastman Avenues are part of the Nicollet Island Addition surveyed in 1865 by Franklin Cook. The original intentions of the land developers and the surveyor are visible and the multi-lot grid plan attests to the intended urban character of the area. The railroad tracks which were built across the island in the 1890s determined the character of some nearby parcels but did not deter W. W. Eastman and others from building large and costly houses.

**September, 1805**  
Explorer Zebulon M. Pike spends one night camping on the island.

**1821**  
A sawmill is constructed on the west bank of the river near the Falls to provide lumber for the construction of Fort Snelling.

**1837**  
Treaty with the Dakota cedes east side of the river to the United States.

**1838-39**  
Joseph N. Nicollet explores and maps the area.

**1838**  
Franklin Steele claims 322 acres along the east bank of the Mississippi, including all of Nicollet Island.

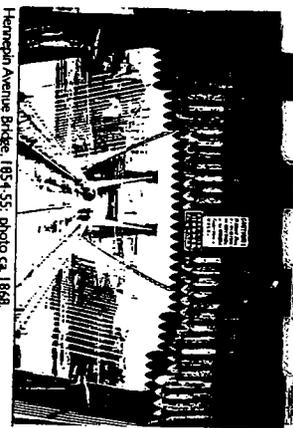
**1847**  
Ferry service is established at the site of the Hennepin Avenue Bridge.

**1848**  
Steele builds a dam across the east channel below Nicollet Island.

**1849**  
John and Ann North move into Franklin Steele's unfinished log house on Nicollet Island. Land speculators file plats of St. Anthony City and the Town of Saint Anthony.

**1850**  
The Norths move to a house on the east bank of the river. They found and relocate to Northfield, Minnesota in 1856.)

Visit of Swedish novelist Frederika Bremer.



Hennepin Avenue bridge, 1854-55; photo ca. 1868.

**1854-55**  
First permanent bridge across the Mississippi is erected between Nicollet Island and the west bank of the river. Construction of the Winslow House on the east bank.

**1858**  
Nicollet Island fourth of July celebration; later described by Frank G. O'Brien in *Minnesota Pioneer Sketches* (1904).

**1861**  
Hercules Dousman acquires Nicollet Island in mortgage foreclosure.

**1865**  
Dousman sells land to William F. Eastman, a lumberman and miller, and John Merriam, a St. Paul broker. Land surveyed for lots by Franklin Cook.

**1865-1875**  
Residential subdivisions on the northern end of the island by Eastman initially attract tradesmen and shopkeepers. First phase of residential development includes modest Greek Revival and Italianate style houses.

**1866**  
Nicollet Island rejected by the City of Minneapolis for proposed use as a park.

Lawsuit between Eastman and Merriam and the St. Anthony Falls Water Power Company to secure water-power rights. Suit settled in 1868 with agreement that Eastman and Merriam could draw enough water from the river to generate 200 horsepower. Permission to

excavate a tunnel between Nicollet and Hennepin Islands also granted.

**1869**  
Eastman begins unsuccessful attempt to dig a railrace tunnel beneath the falls, linking the southern tip of Nicollet Island with Hennepin Island.

**1869-1880**  
Collapse of the tunnel and covering of the falls.

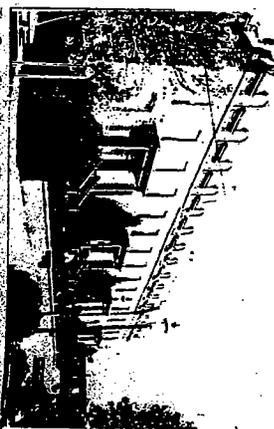
**1872**  
St. Anthony and Minneapolis incorporate as the City of Minneapolis.

**1874-78**  
Horscar service initiated across the Hennepin Avenue bridge and along Hennepin Avenue. Construction of a few large and costly houses on the northern end of the island.

**1877**  
Eastman constructs the first of a series of four-story rowhouses along Eastman Avenue and Grove Street.

**1878**  
Stone towered suspension bridge replaces 1854 bridge.

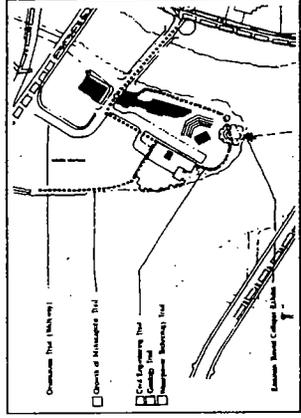
**1879**  
Eastman constructs the Island Power Building on the east channel on Merriam Street. The William Bros Boiler Works, Cedar Lake Ice, and other industrial firms are attracted to the southern tip of the island.



The Grove Street Plaza (1877), listed on the National Register of Historic Places, has a distinctive slate-covered mansard roof.

Only a few years since the beautiful island which divides the Falls of St. Anthony could have been secured by the city of Minneapolis, which overlooks it, for a trifling sum, and would have made a park of a perfectly unique and rarely attractive character, but the opportunity was lost and is now never alluded to but with regret.

H.W.S. Cleveland, Landscape Architecture and Applied to the Wants of the West, 1873



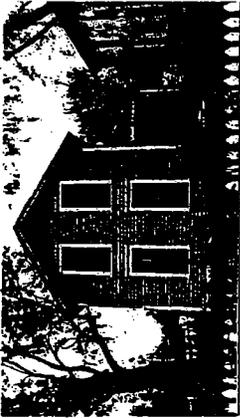
The Saint Anthony Falls Interpretive Plan, 1990.

- 1880s  
Shift to rental housing on the island. Developer Franklin C. Griswold constructs houses on Maple Place and at 107-9 West Island Avenue. First multiple-unit rental dwelling built in 1881 by William Burneth at 111-113 W. Island Avenue. Minneapolis Cold Storage Warehouse constructs buildings along the railroad tracks in 1886.
- 1889-1890  
Franklin C. Griswold completes first of two large duplexes on the island at 15-17 Maple Place and 107-109 W. Island Avenue.
- 1890s  
Last decade of residential development at the island's northern end; Woodward Flats at 187-190 E. Island Avenue among last residential units constructed (1898). Influx of natives of Denmark, Ireland, and Slavic countries, particularly near E. Hennepin Avenue.
- 1891  
New steel arch bridgeplaces 1878 stone-bowered Hennepin Avenue suspension bridge.
- 1893  
Major fire at Cedar Lake Ice spreads to other factories at the southern tip. Despite rebuilding, industrial development on the island never recovers. William Bros Boiler Works rebuilt shortly after the fire. Island Sash and Door, now the Nicollet Island Inn, was under construction at the time of the fire and was not significantly damaged. Fire also devastates surrounding portions of old St. Anthony.
- 1898  
Construction of 4-classroom Nicollet School at 137 W. Island Avenue. Closed in 1918, subsequently used by light industry. Gradual decline of the area as a residential area; outmigration of most "old" families complete.
- 1906  
Jaget Straus, Edwins and Halden Plan for redevelopment published in the *Minneapolis Journal*. This first comprehensive plan for island redevelopment shows parks, pavilions, and public baths.
- 1907  
Rolan Alexander store fixture building (195 E. Island Avenue) constructed.
- 1917  
Edward Bennett Plan of Minneapolis declared "the manifest destiny of Nicollet Island is to be a park." The Bennett plan included proposals for an Olympic-sized stadium and a landing field.
- 1920s  
Expansion of DeLaSalle High School.
- 1930s  
Demolition of Eastman Avenue rowhouses and other residential structures underway; Grove Street Flats (1877) only surviving example of rowhouses. Island Power Building razed in 1937.
- 1940s and 1950s  
Conversion of island housing into rental and rooming houses.
- 1957  
Chicago consultant Frederick T. Aschman recommends clearance of buildings on the island and future use as a park: "DeLaSalle High School could be left where it is, but the rest of the island could be cleared... a private concessionaire, forbidden to introduce honky-tonk attractions, could make it into a delightful amusement park, unique in America, and equal to the wonderful places in Europe such as Tivoli park in Copenhagen".
- 1959  
DeLaSalle expands to prepare for enrollment of 1,500; most of the remaining Eastman Flats are demolished. Nicollet Island steering committee created to plan a national monument at the first bridge crossing of the Mississippi.
- 1961  
Hertz constructs a truck storage garage at Nicollet and Grove Streets. Barton Aschman's report for the Downtown Council and the Citizen's Committee for Nicollet Island is called *St. Anthony Falls-Landmarks at the Continent's Heart*. The report focuses on the development of an historic area at the southern tip of the island.
- 1963  
Boom Island sold by Chicago Great Western Railroad to Carl Bolander; use changes from railyard to construction material stockpile.
- 1964  
Proposed routing of Interstate 335 moves from north of Boom Island to the north tip of Nicollet Island; project later abandoned.
- 1968  
Urban Renewal Plan prepared by the Minneapolis Housing and Redevelopment Authority. The Plan calls for removal of blight, and does not discuss the preservation of historic structures except for the Grove Street Flats.
- 1970-71  
Demolition of various residential and commercial structures on the island conducted by urban renewal programs. Grove Street Flats designated a National Landmark. Architectural survey of the area completed by the Minnesota Historical Society. Nicollet Island listed on the National Register of Historic Places (1971) as part of the St. Anthony Falls Historic District.
- 1972  
Clearance of commercial buildings on E. Hennepin Avenue begins.
- 1973  
Minneapolis Housing and Redevelopment Authority's Nicollet Island East Bank PAC publishes plan recommending restoration of housing on the island.
- 1974  
Minneapolis Park Board acquires most of the island.
- 1976  
The Riverfront Development Coordination Board is formed as a forum for discussing future development of the riverbanks and the island.
- 1980s  
Saint Anthony Falls Rediscovered (1980), published by the Riverfront Development Coordination Board, catalogues many aspects of the area's past development.
- Development of Riverplace and St. Anthony Main retail complexes; Boom Island redeveloped.
- MCDA and Park Board negotiate a plan for lease agreement; MCDA holds a 99-year lease on 22 parcels and 17 structures on the island.
- Nicollet Island Park at the southern tip of the island is developed using the William Bros Boiler Works as a picnic shelter (1983).
- Nicollet Island Residents, Inc. and Twin Cities Housing Development Corporation formed to restore residences; creation of the Saint Anthony Falls Heritage Board.
- 1985-90  
Publication of Scott Anfinson's "Archaeology of the Central Minneapolis Riverfront" in the *Minnesota Archaeologist*.
- 1990  
Completion of new Hennepin Avenue Bridge, the fourth bridge at this crossing point. *Saint Anthony Falls Interpretive Plan* prepared by Ellerbe Becket, including recommendations for Nicollet Island.
- 1991  
St. Anthony Falls Heritage Trail Master Plan prepared by Martin & Pitz Associates and other consultants.
- 1992-96  
Development of master plan proposals for Nicollet Island and the B.F. Nelson site by Martin & Pitz Associates et al. Street improvements begin in 1996.

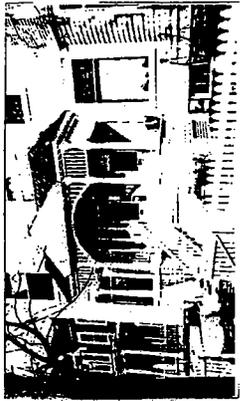


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The Nicollet Island Residential Area of the St. Anthony Falls Historic District includes twenty-one residential properties at the northern end, five of which have been moved in from other areas in Minneapolis. Archaeological remains of previous residences as well as early industries remain scattered throughout this area. The present houses are irregularly spaced along East and West Island Avenues, Maple, and Nicollet Streets, and are interspersed with unbuilt lots. Historic maps indicate that the area has long been dotted with this open space. An early resident, Mrs. Ella May Griswold Guildford, wrote of a fenced croquet ground on one open lot at the corner of Maple and Nicollet Streets.



George W. Brookins House, 163 Nicollet Street, 1873. This gable-roofed, wood frame house shows the influence of the Greek Revival style on a simple vernacular design. It stands on its original limestone foundation.

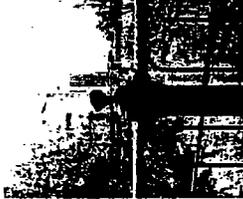


The second Franklin Griswold House, 107-109 West Island Avenue. This Queen Anne Style duplex was built in 1890 by a noted builder of multiple-family houses on the island. 15-17 Maple Place and 27 Maple Place are among other properties also built by Griswold.

The Nicollet Island Residential Area is listed on the National Register of Historic Places and is also locally designated by the Minneapolis Heritage Preservation Commission as a historic district. The National Register nomination noted that "the houses present a variety of 19th-century stylistic trends and comprise an unusually coherent collection of domestic housing from the period 1864-1989." Design review for proposed alterations to the properties, including additions, is conducted by the Minneapolis Heritage Preservation Commission.



Brick pavers from the turn-of-the-century still line some streets.



Ornamental ironwork adds to the character of the area.



A variety of wooden picket fences enhance island residents' distinctive landscape designs.

(For more information about the district, see the St. Anthony Falls Historic District Nicollet Island Residential Area Nomination to the National Register of Historic Places, 1991, on file in the State Historic Preservation Office, Minnesota History Center.)

Located at the mid-point of the Mississippi and at the heart of Minneapolis, Nicollet Island will, in the future, recapture its historical importance to the development of the city and region. Visitors will find many possibilities here, both for recreation and leisure and for education. Through interpretation, they will have the opportunity to learn how the island has evolved over time and how it preserves a record of the river's geological evolution and the city's earliest development. Through conservation and new design, they will experience a landscape integrating buildings, streets and spaces which speak genuinely of the island's story. New development, including recreational facilities, will be sensitively planned and designed with regard to the distinctive residential community that has always existed here.

Five categories of design and planning principles were created to guide the development and evaluation of master plans for Nicollet Island and the B. F. Nelson site on the east bank of the river. The principles were reviewed with the Technical Advisory Committee and presented to residents at several meetings. (See Planning Goals and Objectives, p. 3.)

### THE NATURAL ENVIRONMENT & THE URBAN SETTING

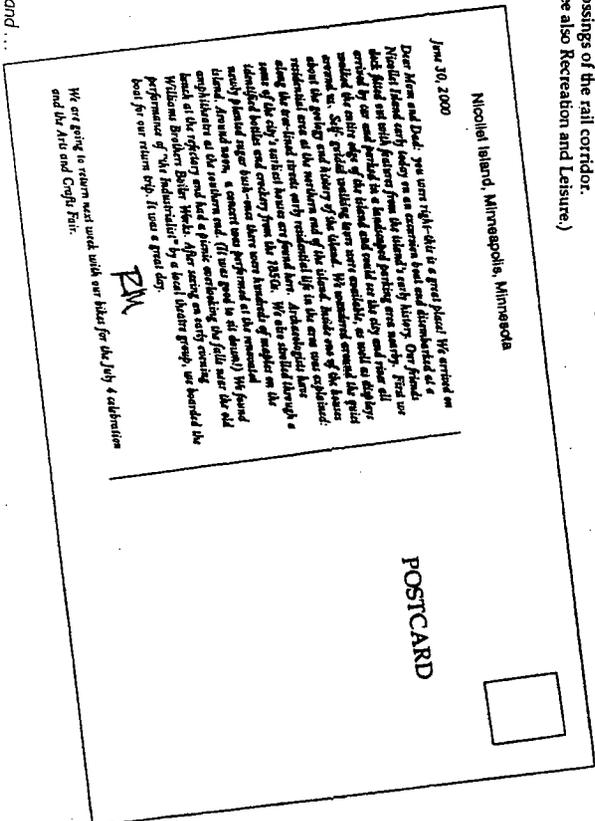
1. Preserve and enhance significant vistas of the island from other points in the city.
2. Allow visitors to explore the water's edge where possible under safe conditions.
3. Protect steep slopes and existing wild vegetation.
4. Maintain the forested image of the island.
5. Reinroduce the maple/bass wood climax vegetation.
6. Minimize human impact on undeveloped river edges.
7. Use natural materials to stop bank erosion.
8. Reduce sound impact from Main Street and from the island to surrounding areas.
9. Provide for interpretation of the geological and natural history of the island and its surroundings.



### CIRCULATION & ACCESS

1. Provide effective signage to direct visitors and inform them of parking and recreational features.
2. Control traffic so as to be in scale with residential areas.
3. Maintain narrow road width and reduce lane width to encourage slow-moving traffic.
4. Encourage walking and biking as the primary visitor activity at the upper island.
5. Provide emergency access over the Nicollet Street railroad bridge.
6. Provide off-street parking for residents.
7. Provide off-street parking for visitors, connected to path systems.
8. Accommodate rubber tire and rail trolleys.
9. Develop a plan to accommodate existing rail trackage, one which considers possible future LRT impacts.
10. Provide safety controls at all auto, bike and pedestrian crossings of the rail corridor.
11. (See also Recreation and Leisure.)

A future visitor might report after a trip to Nicollet Island...



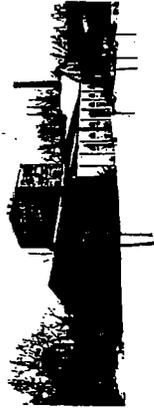
RECREATION & LEISURE

1. Organize recreational experiences to be complementary to the region's landscape and history.
2. Balance recreational facilities with the island's recreational capabilities, and coordinate them with facilities within the larger river regional park.
3. Provide a variety of pedestrian bicycle routes including:
  - Paths around the island edge.
  - Connections to adjacent off-island areas.
  - Separated pedestrian and bicycle paths where possible.
4. Provide boat docking facilities for several types of craft:
  - Tour boats
  - Rowboats and canoes
5. Provide opportunities for unique activities such as croquet, carriage and sleigh rides, picnicking, lawn tennis, and an historic theme playground.
6. Provide opportunities for socialization at gathering points suitably located around the island.
7. Provide a major celebration and gathering point near the existing pavilion.
8. Integrate interpretive sites with recreational facilities:
  - Yearly sugarcrush events.
9. Design recreation facilities which will not conflict with the residential character of the island.
- Minimize impacts on private residences.



DESIGN

1. Recognize the historic pattern of land use in planning new development in the three "zones" (characterized as "upper," "middle," and "lower").
2. Preserve the integrity of the original (1866) street plan of the island.
  - Minimize the introduction of curvilinear elements for public street design.
  - Mark the original street pattern through subtle but distinctive means.
3. Design streets and other public improvements at a scale appropriate to the structures and spaces of the island.
  - Lighting, paving, and curbs should utilize limestone, brick, and other historic materials.
4. Place street trees in appropriate historical alignment and density.
5. Minimize disturbance of the upper island:
  - Protect grades.
  - Leave unbuilt lots open.
6. Provide active recreation space where it complements the historic pattern of land use.
7. Protect, rehabilitate and maintain historic sites and structures according to the Secretary of the Interior's and Minneapolis Heritage Preservation Commission guidelines.
8. Develop design guidelines for future structures including those adjacent to existing units: garages, studios, etc.



ARCHAEOLOGY & HISTORY: INTERPRETATION

1. Develop a plan for archaeological investigation.
2. Interpret the results of this investigation through exhibits and other media.
3. Develop a plan for interpretation of historic themes including:
  - The role of native peoples in the exploration and settlement of the island.
  - Early agriculture.
  - Early industries including brewing and quarries.
  - Manufacturing on the lower island.
  - Early transportation.
  - The former commercial district along Hennepin Avenue.
  - The relationship of the island to the falls and early waterpower politics.
  - The role of the 1893 fire.
  - The residential community: architecture, institutions, and social life from 1850 to the present (including 4th of July celebrations).
  - Planner's visions for Nicollet Island, from the mid-nineteenth century to the present.





Three new park areas are among the highlights of the plan for the north island. The open space at the tip will be left predominantly open and planted with meadow grass species to recall the climax forest present within the old prairie edges.

The island's nineteenth-century quarries will be recalled in open space at the west, with blocks of limestone providing informal seating and gathering areas. The third park area, a maple grove, will recall the climax forest present on the island when permanent settlement began.

The grove will provide openings for picnic gatherings. Tennis courts or multi-use recreational space will be located immediately south of the area to accommodate more active uses such as softball games.

A bituminous path system will link these open spaces and tie them into the Grand Rounds path which continues all around the island. This key path unites the island and provides opportunities for views to the river and Boom Island.

Maple street trees and historic lighting will flank the renovated streets. The streets will be composed of modular pavement to recall the brick pavers used on the island in the past.

**MASTER PLAN**  
NORTH ISLAND  
2ND REVISION  
MARCH 1983

**NICOLLET ISLAND AREA**

MINNEAPOLIS PARKS AND RECREATION BOARD

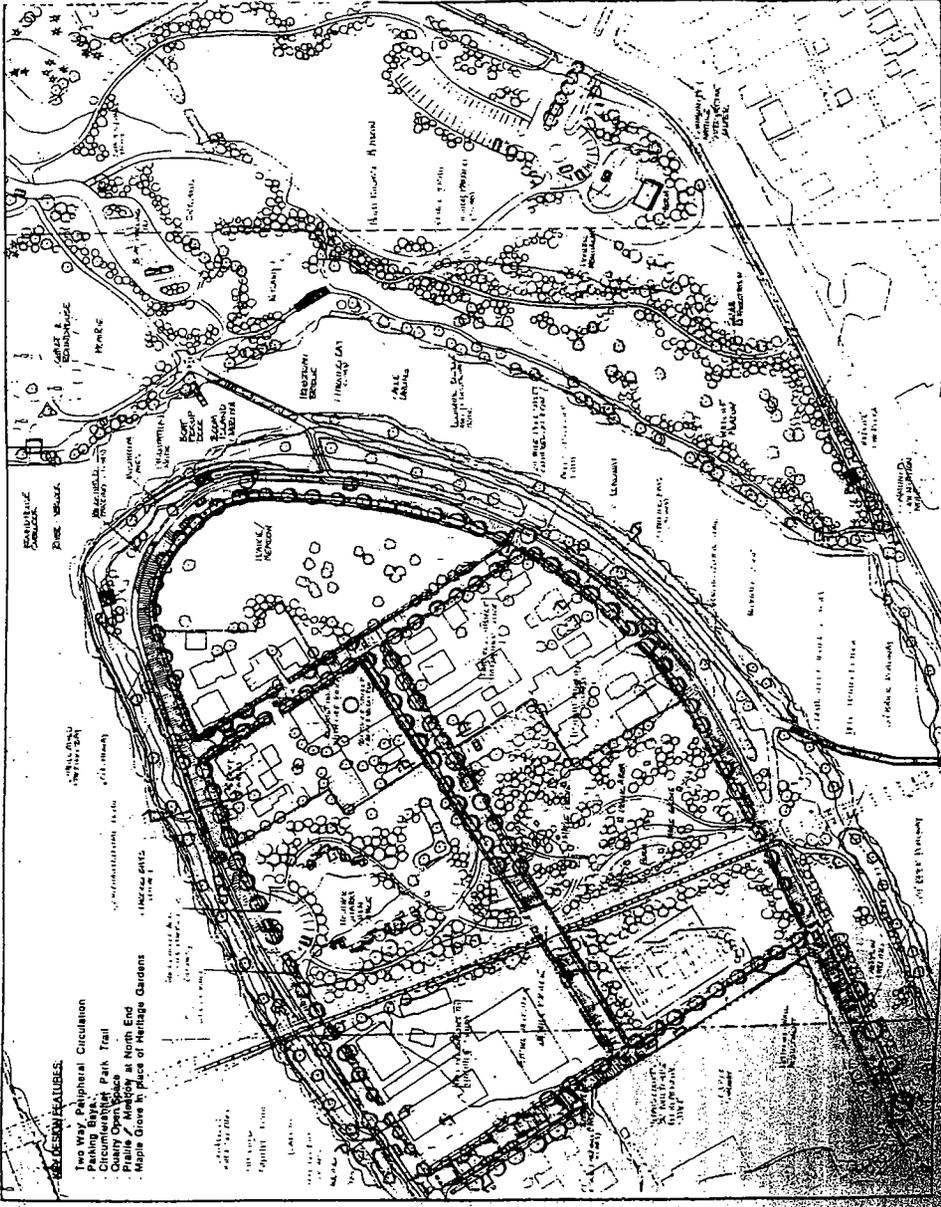
MARTIN & PITZ ASSOCIATES, INC.  
LANDSCAPE ARCHITECTS, 1500 W. WASHINGTON ST., SUITE 100, MINNEAPOLIS, MN 55403

SCHOELL & MADSON, INC.  
ENGINEERS, ARCHITECTS, PLANNERS  
300 W. WASHINGTON ST., SUITE 100, MINNEAPOLIS, MN 55403

LANDSCAPE RESEARCH, INC.  
BY PAUL W. BIRN

**KEY**

- BRICK STREETS
- BRICK SIDEWALKS
- IMPROVED STREETS
- PAVED BAY
- UNIMPROVED STREETS
- PROPOSED SIDEWALKS WITH REAL COAT BITUMINOUS WITH REAL COAT
- EXISTING TREES
- PROPOSED TREES
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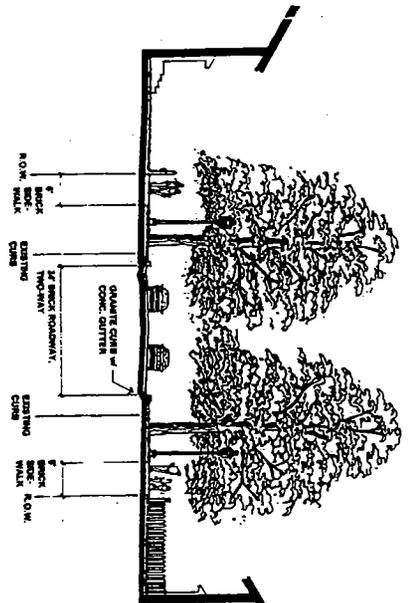
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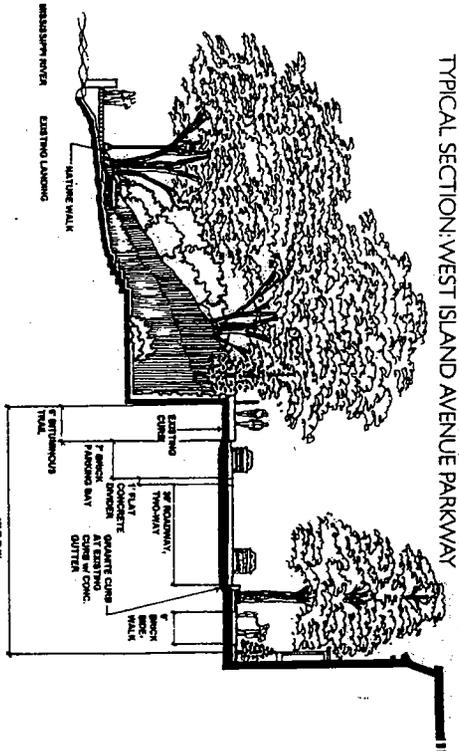
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TYPICAL SECTION: NICOLLET STREET

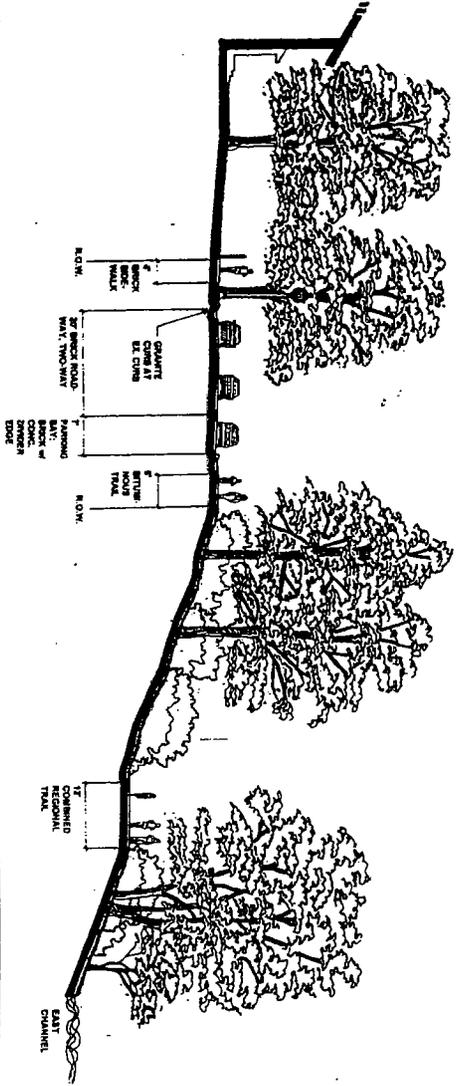


The Nicollet Street section shows the neighborhood scale of the maple-lined streets improved with modular paving and historic lighting.

TYPICAL SECTION: WEST ISLAND AVENUE PARKWAY



TYPICAL SECTION: EAST ISLAND AVENUE PARKWAY

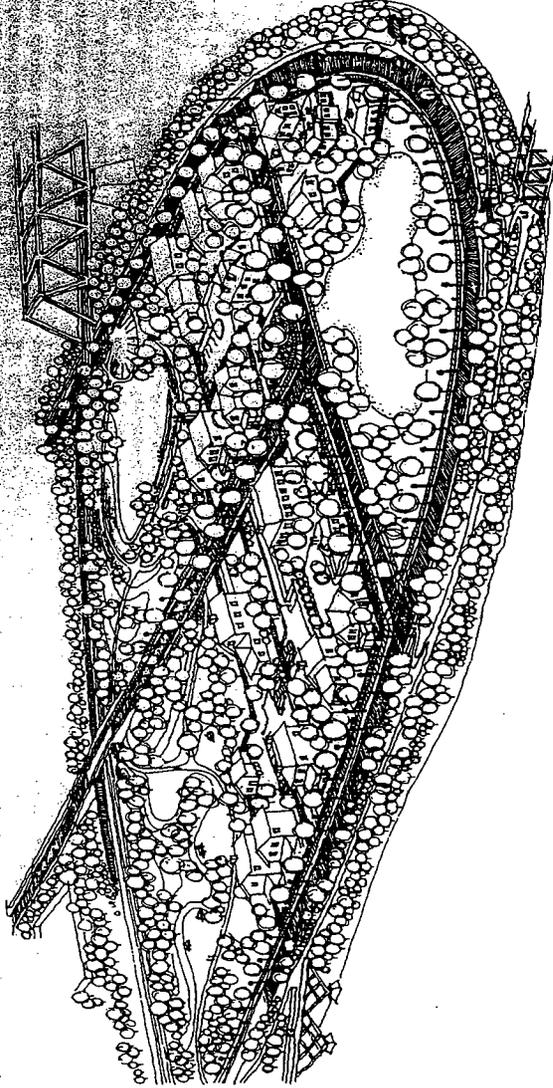
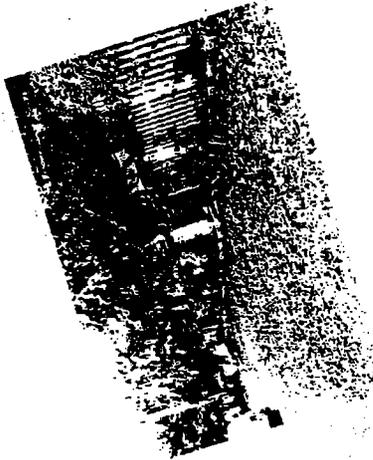


The East Island Avenue Parkway section (left) illustrates the up-graded peripheral 20-foot parkway with 7-foot parking bays and the 6-foot bituminous circumferential trail. In this area available space is most limited. The section also illustrates the 12-foot wide combined bicycle and regional trail on the old rail bed. It links the island to Boom Island and Main Street.

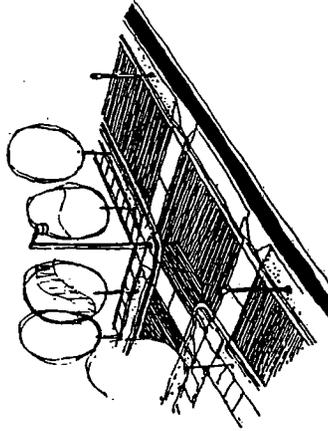
The West Island Avenue Parkway section (above) illustrates the up-graded peripheral 20-foot parkway with a 7-foot parking bay and 6-foot circumferential trail. This is located in an area of the north island on the west side where space is most limited. The existing landing near the Grove Street flats is to be maintained and a maple-lined boulevard is maintained as well.

### THE NORTH ISLAND

The Nicollet Island Master Plan links the historic residential area at the northern end with the recreational area at the southern end. The primary connection is a "Grand Rounds" parkway with pedestrian and bicycle paths.



### RECOMMENDED STREET TREATMENT



Street: Modular  
Residential Walk: Concrete,  
Circumferential Path: Bituminous  
Crosswalks: Concrete

## 16. / THE B. F. NELSON SITE / Design and Planning Principles

A succession of nineteenth-century paper and saw mills once operated in the area most recently known as the B. F. Nelson site. Now cleared of its former industrial uses, this site will be an important element of the Central Riverfront Park. The public park will take advantage of a unique lower wildlife area adjacent to the east river channel, and provide a variety of walkways and viewing areas adjacent to the river. The upper plateau will provide multi-purpose activity spaces as well as parking for special events.

### Planning Goals and Objectives

1. Identify and understand the authentic components of the site's character: natural, environmental, historic, and cultural;
2. Provide visitors of all ages, backgrounds, and physical abilities with a variety of recreational and educational opportunities;
3. In new design, maximize all aspects of the natural river setting;
4. In new design, reinforce the physical and historic relationship of the site to the river corridor, particularly Nicollet and Boom Islands;
5. Provide recreational opportunities as well as appropriate visual and acoustical buffering where necessary.

### THE NATURAL ENVIRONMENT & URBAN SETTING

1. Preserve and enhance significant vistas of the site to and from Nicollet Island, the East Channel, and other points.
2. Reinforce the character of the upper plateau and the lower zone of the site.
3. Develop uses for the upper plateau which will minimize impacts on the surrounding neighborhoods to the north and east.
4. Provide buffer areas to separate the public park from the residential area.
5. Allow visitors to explore the water's edge where possible under safe conditions.
6. Minimize human impact on undeveloped river edges.
  - Use natural materials to stop shoreline erosion.
7. Provide for interpretation of geological and natural history.
8. Provide opportunities to experience wildlife and the natural character of the river's east channel from the lower zone.

### RECREATION & LEISURE

1. Provide multiple-use recreation areas on the upper plateau.
2. Provide canoe and rowboat access areas to the east channel of the river.
3. Provide appropriately designed paths along the river's edge with overlooks.
4. Provide opportunities for:
  - Bird watching
  - Bank fishing
  - Wildlife observation
  - Photography and sketching
5. Provide opportunities for river viewing at suitably located gathering points.

### CIRCULATION & ACCESS

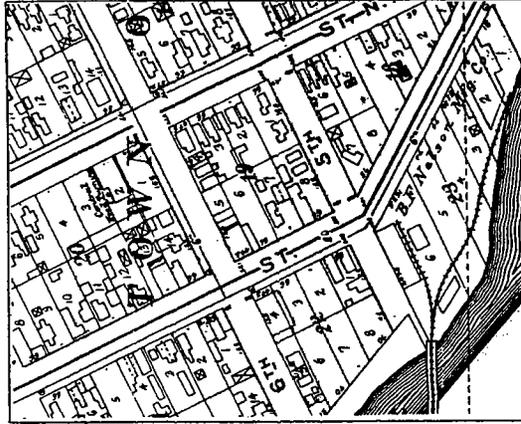
1. Provide parking on the upper plateau.
2. Provide appropriate signage to direct visitors around the site, to Nicollet Island, and to other points in the area.
3. Provide access connections to adjacent neighborhoods and other related regional park areas.

### DESIGN

1. Introduce features which are appropriate to the natural and historic character of the area.
2. Provide active recreation space which complements the natural character of the site.
  - Protect grades
3. Develop design guidelines for future recreation structures including rest facilities.

### ARCHAEOLOGY & HISTORY: INTERPRETATION

1. Interpret the history of the adjacent neighborhood and early industry of the site, including:
  - The old Saint Anthony community
  - Paper mills and saw mills
  - The B.F. Nelson Company
2. Protect significant archaeological features from harm from new construction.



The B. F. Nelson site in 1914.



A winter view of the lower portion of the B.F. Nelson site from the east channel of the river.

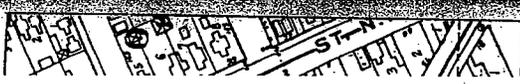
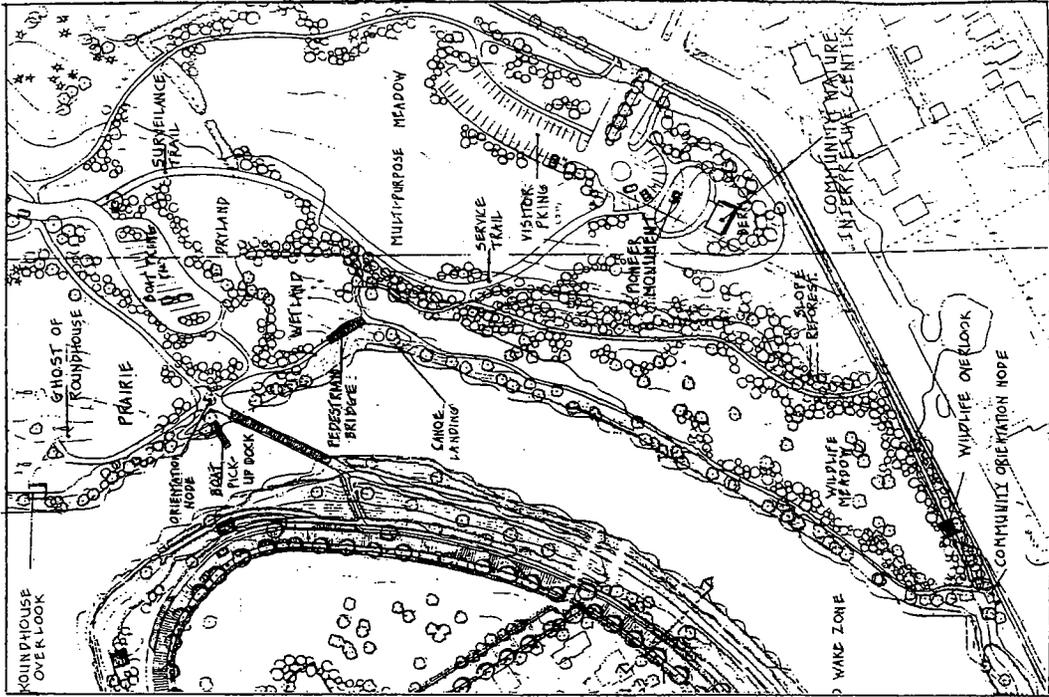


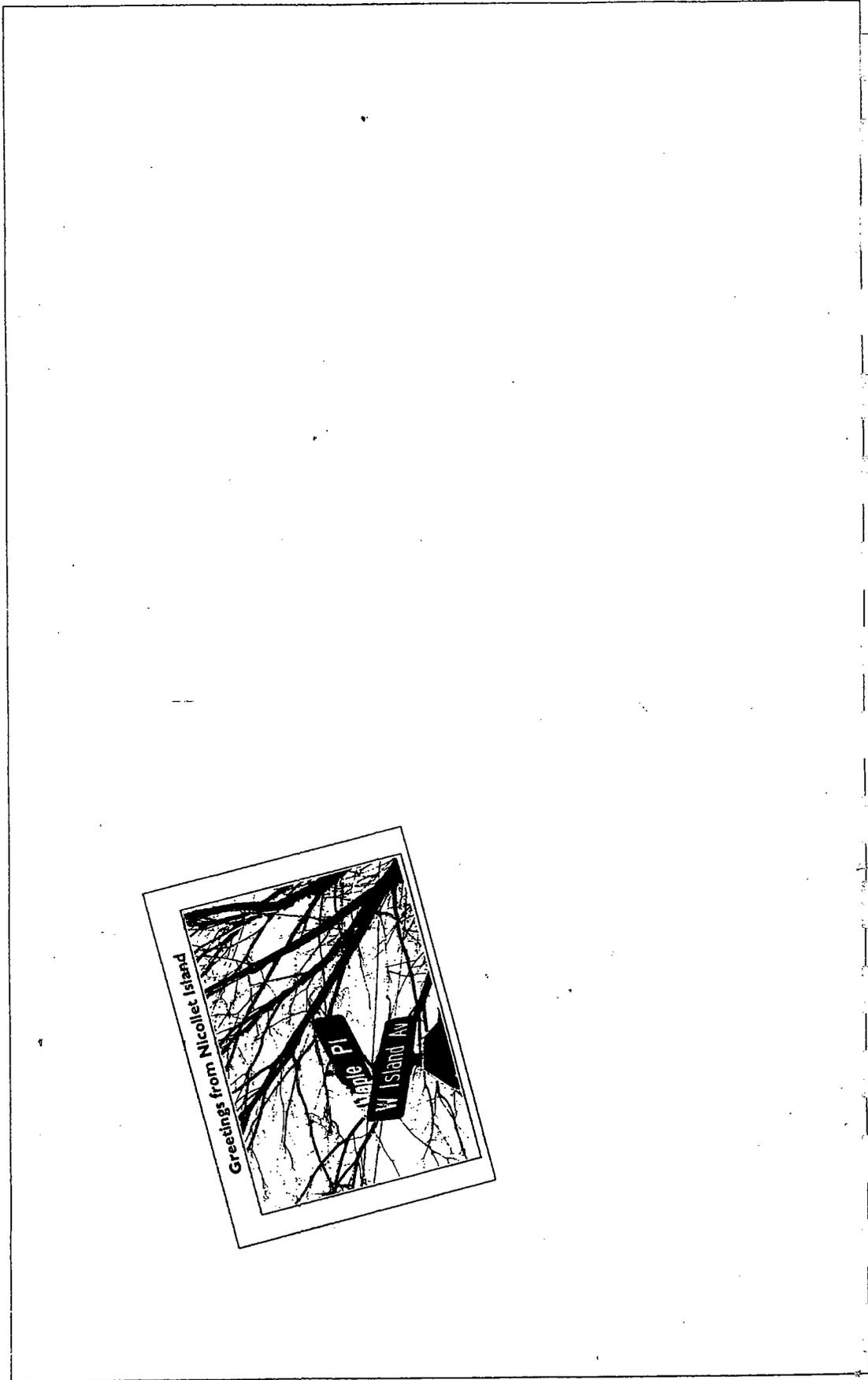
Due to the dramatic topographic features of this site, the area is developed in two zones. The lower zone, with water level access, provides a unique opportunity to experience the river close up with a feeling of 'wildness' in the midst of the city. This area is developed with native plantings to encourage wildlife. Peripheral paths encourage visitor's exploration of the wildlife meadow and the river's edge. In an area which was the original eastern edge of Boom Island, these paths converge at a small bridge. From the bridge there are views of natural areas which developed as a reconstituted marsh wetland and intermittent dry wetland.

The upper area is developed for multi-use active recreation with large open turf areas. A community nature center for interpreting the wildlife within the area is also shown. Several parking areas are provided. These facilities are located within the old Marshall Avenue corridor to minimize disturbance of the site.



The bridge connection between Nicollet Island and the B.F. Nelson site.





From: Orange, Michael  
Sent: Monday, November 28, 2005 3:08 PM  
To: 'Cronin, Michael'; 'Galatz, Eric'; Farrar, Rebecca D.  
Subject: FW: Nicollet Island EAW

Michael Orange, Principal Planner  
City of Minneapolis  
Community Planning and Economic Development  
350 S. 5th St, Room 210 City Hall  
Minneapolis, MN 55415-1385  
Phone: 612-673-2347  
Fax: 612-673-2728  
TTY: 612-673-2157  
Email: michael.orange@ci.minneapolis.mn.us

-----Original Message-----

From: Peter Johann Willcütt [mailto:pjwillcutt@mn.rr.com]  
Sent: Wednesday, November 23, 2005 4:16 PM  
To: Orange, Michael  
Subject: FW: Nicollet Island EAW

I am forwarding for Mr Gary Johnson, of the U of MN -----Original Message-----

From: Gary R. Johnson [mailto:grjonson@umn.edu]  
Sent: Wednesday, 23 November, 2005 11:25  
To: peat@pipapeat.com  
Subject: Nicollet Island

Dear Peter,

You asked for my opinion regarding our brownfield tree performance study on Nicollet Island, especially as it relates to the potential loss of trees due to the high school's proposed expansion.

When we set this up, it was a 3 year contract/agreement with MPRB. That officially ended in 2003. The two years since then have been frosting on the cake and we realized that although we had no right to request an extension of the contract, we certainly would take advantage of it.

We have gained a lot of information on tree performance via this study and would love to see it continue, but we also know that things end for various reasons. If the trees are removed or relocated according to the high school's expansion plan, the research value of the area will effectively end. Such is life.

Our contract and very limited funding for this study ended in 2003. Since then, I've funded the continued work from my own research lab. So, if the research ends now it won't mean that I will have lost any funds. I'll only have lost expenses and good data.

Regards,

Gary

From: Phyllis Kahn [rep.phyllis.kahn@house.mn]  
Sent: Monday, November 21, 2005 10:21 PM  
To: Orange, Michael  
Subject: EAW for DeLaSalle Football and Soccer Stadiums, Nicollet Island, Minneapolis

November 21, 2005

TO: Michael Orange, Principal Planner, Minneapolis

FR: Phyllis Kahn, State Representative 59B, 115 W. Island Ave.  
Minneapolis, 55401

RE: EAW for DeLaSalle Football and Soccer Stadiums, Nicollet Island, Minneapolis

Please accept the following comments to the draft EAW. Part will be general comments on the project, followed by specific references to items in the draft EAW.

Most critically, I believe it is necessary to proceed to an EIS. The most important difference between an EAW and an EIS is the requirement to examine alternatives in an EIS. In all of the testimony before the MPRB and the CAC, DeLaSalle representatives have clearly indicated that they will not consider alternatives until this plan is rejected.

Performing an EIS would be an appropriate compromise rather than the extreme confrontation that starting with total rejection would entail.

The proposed stadium is incompatible with both the needs of the children of the city of Minneapolis and with the recreation needs of the census tract it is located in and surrounding census tracts. Two maps are attached, one showing the percentage 17 and under and one showing the population of those 17 and under. The maps are shaded according to each there population and percentage of population.

In addition, if appropriate usage is to be considered in an EAW, the young adults moving into the neighborhoods on both sides of the river are likely to be high users of the tennis courts once they find out about them. (Note: Is their existence as public courts noted in any MPRB publication or website?)

It is also inconsistent with metropolitan regional park principles that preclude sites for active recreation. It should be noted that the construction of the tennis courts, which were a dubious proposal under these standards, were never presented for Metropolitan Council or Metropolitan Parks and Open Space approval.

It is also inconsistent with historic preservation principles.

It has been noted by some project proponents that the houses are an inappropriate use of a metropolitan regional park. This issue was thoroughly vetted at the time of the designation and purchase of the parkland. History has proved that the houses add to the safety, attraction and ambience of the area. This can be attested to by the horse drawn carriage, pedestrian tours and Segway operators that take routes emphasizing the streets with houses.

Specific comments on the EAW.

It is particularly inappropriate to further institutionalize parking in such a small piece of green space in the center of the city. The EAW consistently calls Parcel C a gravel-surfaced parking lot (p. 4, 5, 16, 19). The area in question is not covered with gravel; it is only an unimproved surface with some soil, grass and even asphalt remnants. The proper treatment should be to restore it to an appropriately vegetated site, even if it may be necessary to rarely have it available for overflow parking.

Page 5d and Page 26. The statement saying there are no future stages of this development is inaccurate. The 1983 agreement (p. 7) allegedly promised DeLaSalle a football field and tennis courts. This proposal removes the tennis courts, leaving their future location subject to future demands.

Page 9-11. Agreeing that there are not likely to be endangered species present, doesn't excuse not cataloguing the wildlife on the hill, scheduled to become a field. Small spaces for wildlife and bird refuge are more significant in the center of a city.

Page 16. The comparison of the traffic changes to the capacity of a two lane resident street is inappropriate. Few two lane residential streets have the numbers of walkers, bicyclists, horse drawn carriages, and Segway tours that complicate traffic in this area.

Page 19. Vacation of Grove Street. Rather than conjecture that the movement of traffic circulating through the high school parking lot or along West Island Avenue will be more convenient than going north into the neighborhood on Nicollet Island, a trial closure and measurement should be done.

From the map on page 17, rather than circulating through the parking lot, the "unvacation" of Eastman Street should be considered. (Is there a record of the process and thoughts behind the vacation of Eastman Street?)

Page 22. The tables on pages 21 and 22 seem inconsistent with the comments on the lack of a noise problem and the contours in Attachment E. In addition, the statement on page 22 that the "MPCA position on crowd noise from sporting events is that it is unregulated. Therefore crowd noise is not likely to exceed any currently established limits on sound level." is the equivalent of an oxymoron. It specifically does not say that the noise will not affect the ambience of a passive recreation site.

Page 25. The lack of impact on Grove Street flats is clearly misrepresented. The obvious consequences of closing East Grove Street is to double the traffic on West Grove Street to the Nicollet Ave Bridge and accessing the school facilities on Grove Street.

Page 26. Impact on the railroad. Obviously there is no change in the historic route, but the person in charge of rail safety issues at MNDOT has not been contacted (for the draft EAW). Those comments would be essential for the final EAW and the EIS.

Page 27. The 1996 Master plan is referenced. It should be understood that DeLaSalle participated fully in that process, never saying that it needed another football field, didn't need tennis courts and would ask to vacate a newly paved street.

Page 28. Comprehensive Management Plan for MNRRA (MS 116G.15 and MS 116G.151) Describing the six purposes of the recreation area we read in part:

2. Enhance opportunities for public outdoor recreation, education and scenic enjoyment.

MN Statute 86A.03 subd 3 defines outdoor recreation, excluding team athletic activities, as follows:

Subd. 3. Outdoor recreation. "Outdoor recreation" means any voluntary activity, including hunting, fishing, trapping, boating, hiking, camping, and engaging in winter sports, which is conducted primarily for the purposes of pleasure, rest, or relaxation and is dependent upon or derives its principal benefit from natural surroundings; "outdoor recreation" shall also mean any demonstration, structure, exhibit, or activity which is primarily intended to preserve, demonstrate, or explain a significant aspect of the natural and cultural history, and archaeology of Minnesota.

Specifically, an athletic field does not fit into a concept of outdoor river related recreation.

Page 29. Policy 9:15 of the Minneapolis comprehensive plan requires "appropriate physical transition" separation and buffering between residential and non-residential areas.

Grove Street is the appropriate transition and buffer and this proposal by crossing Grove Street violates that. (See page 31 also.)

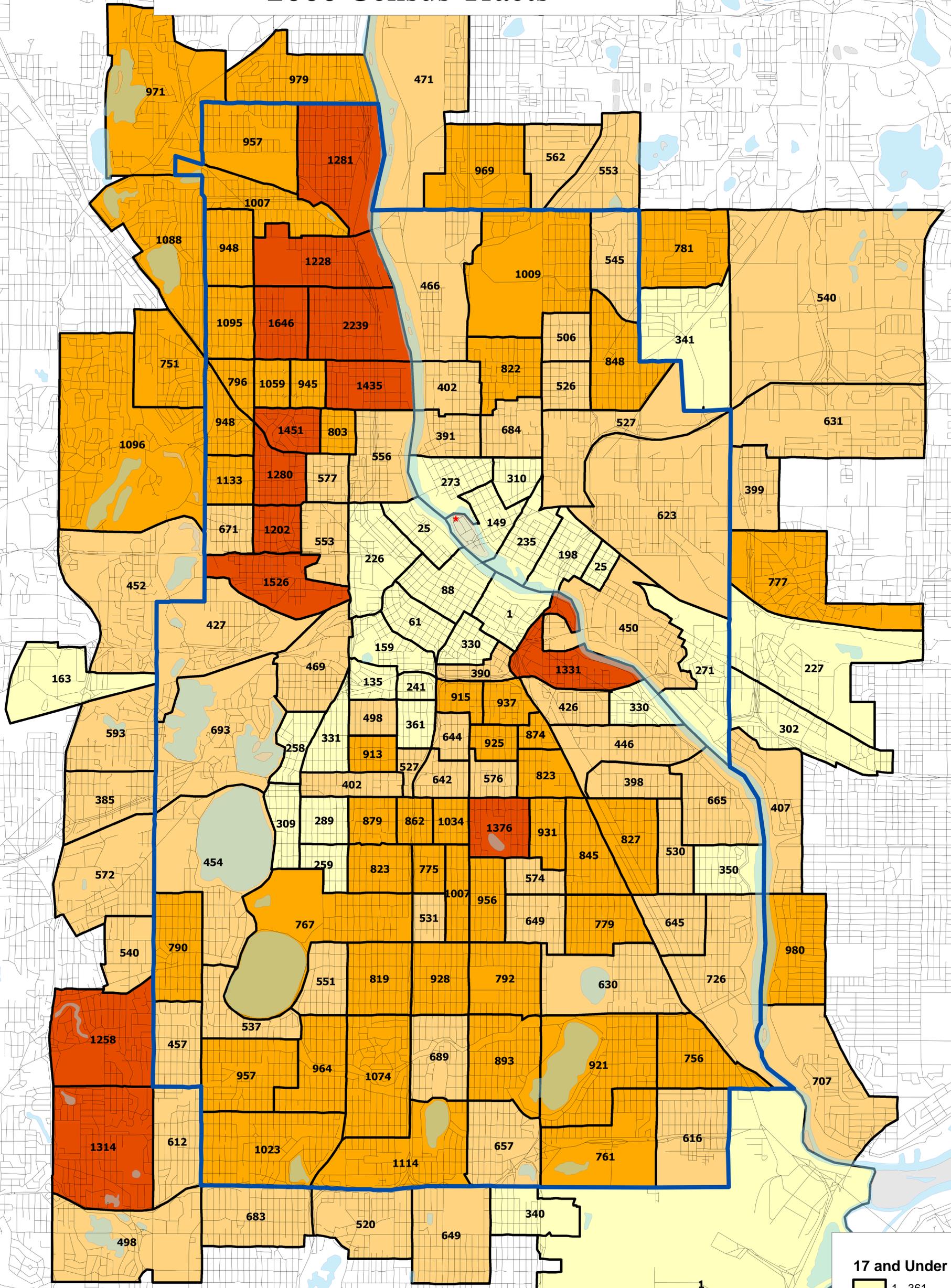
Page 30. Clear violation of policy 9.21.

Page 33. #29. Cumulative impacts have not been appropriately considered. Isolating the noise from an event is not an appropriate use of the word. Impacts must not be isolated but considered on top of other impacts. I have already listed the non-consideration of the tennis court relocation as another neglected cumulative impact.

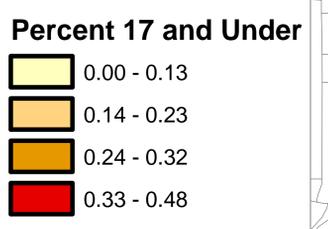
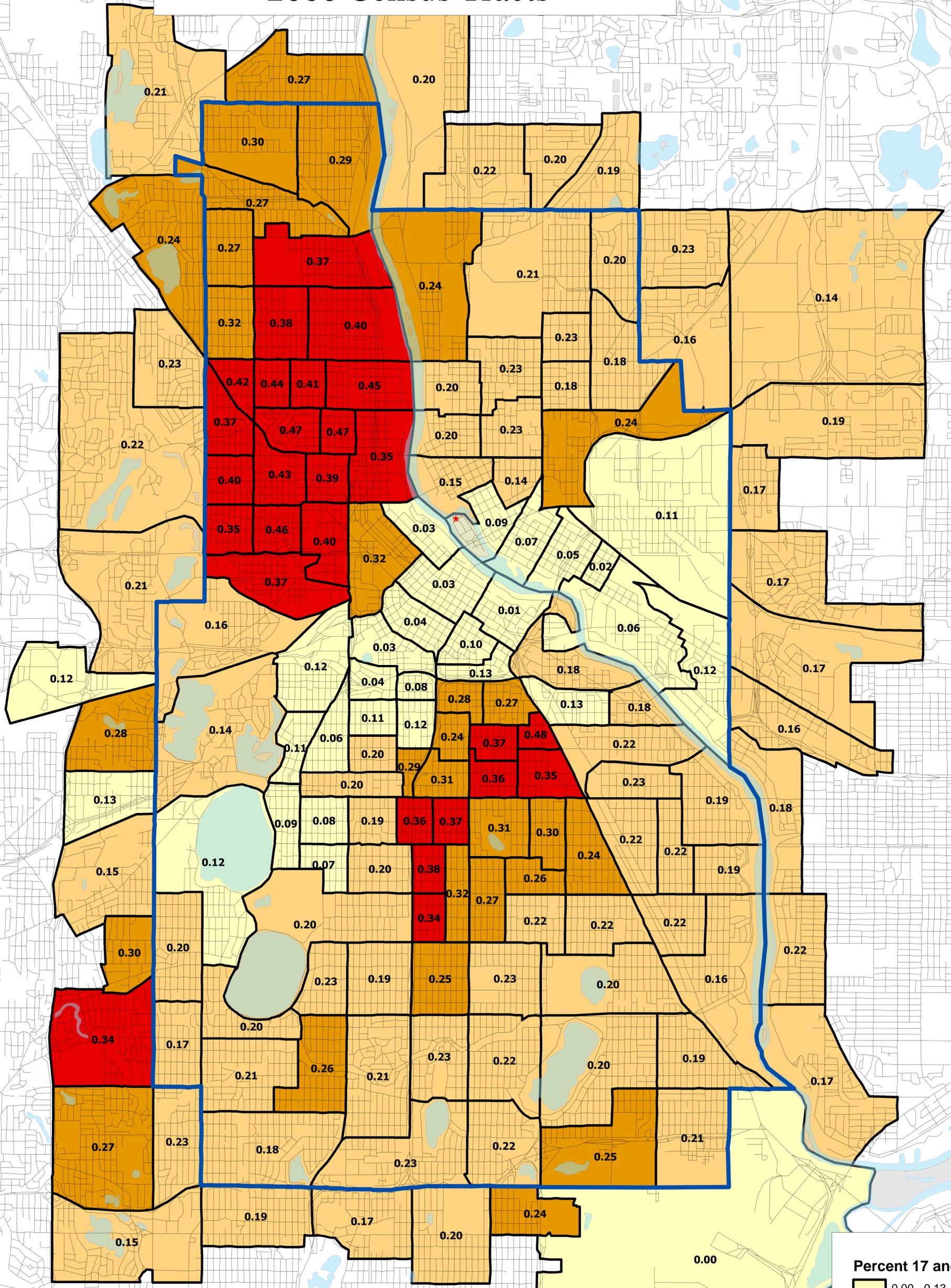
Thank you in advance for addressing these issues.



# 2000 Census Tracts



# 2000 Census Tracts



November 15, 2005

From: Christine Larsen  
2823 West 40<sup>th</sup> Street  
Minneapolis Minnesota 55410

To: J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
Community Planning & Economic Development Department  
City Hall Room 210  
350 S. 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385

**Re: Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic Facility Development Project, Nicollet Island, Minneapolis**

Dear Mr. Orange:

This letter relates to the draft EAW for the proposed athletic facility development project on Nicollet Island within the St. Anthony Falls Historic District in Minneapolis.

As a Minneapolis resident and taxpayer, I am strongly urge you to support an Environmental Impact Statement to evaluate alternatives for use of the Nicollet Island land and alternative locations for the athletic facility.

Many of us are dedicated to preserving Nicollet Island in its present state due to its ecological and historical significance. The existence of Nicollet Island is one of the reasons we choose to live in the city of Minneapolis. Surely there are other areas that can accommodate an athletic complex without the degradation of one of the city's treasured areas.

Best regards,

Christine Larsen

**From:** Judith Martin [jmartin@umn.edu]  
**Sent:** Wednesday, November 23, 2005 2:50 PM  
**To:** Orange, Michael  
**Subject:** DeLaSalle EAW  
Hi Michael,

I thought it might be useful to formally submit the questions I posed at COW a few weeks ago. Sorry that I could not make the island meeting.

I've seen the comments submitted by Jan Hively and Phyllis Kahn, and substantially agree with the issues raised in those.

My specifics:

Regarding the negative response to item "e" (p.5): this project is a subsequent stage of an earlier project - the 1984 easement of Grove Street and expansion of the field to a regulation size.

Regarding the table on p.9 that notes an increase in landscaping --that can only result from closing Grove Street -- DLS isn't adding anything to the landscaping.

Regarding the depth to bedrock (p.13) -- everywhere else on Grove Street it's 12-18 inches.

Regarding the traffic section:

1) all of the discussion of peak hour traffic only takes into account the DLS traffic. Given that football is on Friday nights when there is almost always an even at the Pavilion, the peak hour traffic analysis needs to consider wedding and event parking needs which often fill up the available space in the unimproved lot on East Island -- and the Nic Is Inn also uses that space for valet parking.

2) it's disingenuous to describe Grove Street or any other street on the island as a normal two lane residential street. None of the streets have bike paths (this is a regional park) and some lack sidewalks on one or both sides (Grove Street is an example of this). In all of the planning that went on in the 1980s and 1990s, it was explicitly stated that island streets were to be considered both street and bike lanes, so the vehicles estimation need to consider more than just car capacity. And because there are no bike lanes and few sidewalks, the movement pattern is anything but regular -- people walk in the streets, along with bikes and cars and Segways -- not a regular residential street arrangement at all.

3) The parking analysis says that striping the lot will get DLS to 253 off-street parking spaces -- a mere 22 beyond what currently exists. On regular basketball nights at DLS, people park all over, including in illegal spaces. It's impossible to imagine that an additional 22 spots are going to alleviate this problem (which by the way gets no enforcement at all by Pk Bd police).

A final observation: I remember when the vacation of Eastman Ave came before the CPC -- approving this gave DLS something of a "campus". Since they are now expecting half of Grove Street to become theirs as well, it seems reasonable to me to reverse the vacation of Eastman. There are only 3 streets which cross the island -- it's not good public policy to give 1.5 of these to DLS. If they're going to get Grove Street and inconvenience all of the residents and the public, Eastman should return to public use.

I could write much more, but my neighbors have been diligent, and there's no reason to be repetitive.

Thank you,

Judith

--

Judith A. Martin  
Morse-Alumni Professor & Director    348 Social Sciences,  
Urban Studies                    University of Minnesota  
jmartin@umn.edu            Minneapolis, MN. 55455  
Phone: 612-626-1626  
Fax: 612-624-1044

**From:** clareyse nelson [nelso318@umn.edu]

**Sent:** Monday, November 21, 2005 1:15 PM

**To:** Orange, Michael

**Subject:** [Fwd: nicollet island]

----- Original Message -----

**Subject:** nicollet island

**Date:** Mon, 21 Nov 2005 13:00:55 -0600

**From:** clareyse nelson <nelso318@umn.edu>

**To:** [Michael.Orange@ci.minneapolis.mn.us](mailto:Michael.Orange@ci.minneapolis.mn.us)

I support the comments by Jan Hively and will add my own as well. I am opposed to the proposed siting of a sports stadium on Nicollet Island for the following additional reasons.

I am an avid birdwatcher and, as such, not only appreciate birding on the island both during migration and during the year but also know that the Mississippi River is an important migration corridor as well as habitat for many of our songbirds and resident species such as woodpeckers, cardinals etc. The added noise, lights, people movement and structures will endanger this priceless inner city nature resource.

Also, as a bicyclist, I know many fellow bicyclists find the island a relatively safe and beautiful place to bicycle with few cars and access to all sides of the island. Restricting the road and pathway will lessen this value for many more people than will use the DeLasalle facility.

Please take these concerns into consideration when making decisions for our neighborhood, our city and the future when natural areas will be fewer and fewer so near to this densely populated area.

Thank you. Clareyse Nelson. 601 Adams St. NE Minneapolis, Mn 55413. 612-623-3009.



Public Comment on DeLaSalle Football Field EAW

November 17, 2005

Judith Richardson

163 Nicollet Street

Minneapolis MN 55401

612-379-3384

e-mail: [jbrjvc@aol.com](mailto:jbrjvc@aol.com)

TO: Michael Orange, Principal Planner  
Minneapolis Planning Division

My comments relate to parking and emergency access on the Island.

Parking problems on the island have not been thoroughly studied. No study of the traffic generated during a basketball game at DeLaSalle has been done. (1100 fans and their cars and buses). The RGU should do an onsite count on the evening of a basketball game, document where vehicles park, count how many vehicles are illegally parked, how many intersections are clogged with vehicles, complicating emergency vehicle access to the mid and North sections of the Island. This information should be used to determine the effect of closing half of Grove Street. Using the estimated number of cars expected for a football game, it can be determined if there will still be problems accommodating the number of cars on the Island during a football game. The Island, surrounded by water, cannot absorb an unlimited number of cars legally. Cars cannot spread out into nearby neighborhoods when the legal parking available on the Island is "full". We have photographs documenting illegal parking on the Island during a large event at DeLaSalle. We have pictures of cars parked in intersections, on both sides of the street, and on both sides of DeLaSalle's fire lane in front of the school. Nothing in the EAW considers these real-life situations.

Nothing has been said about the Park Board Police policy which requires closing off access to the Island to all vehicles at both East and West Island Avenues on the South end during large events in the area, such as fireworks displays or the Stone Arch Art Festival. Past experience has shown the danger of allowing unlimited public parking on the Island in these situations, which is why the Park Board Police go to the trouble of banning parking on the Island altogether for large events. It is a fact that emergency access is compromised, and vehicles park illegally on park land during these events. We know that the Park Board Police do enforce closing the Island to all vehicles for large events. Residents must show a driver's license to obtain access to their homes.

Does a DeLaSalle football game, basketball game, or parents' night qualify as a "large event" requiring Park Police to close East and West Island Avenue access? What is the policy for closing off access? Are the number of spaces for parking on the Island really adequate for the needs of these athletic events? If the athletic field is built will there then be an outcry for more parking, requiring more open space to be paved over for parking? Will users of the Central Riverfront Regional Park be constantly trying to defend this small Island from the forces of development and privatization? Once the land for the

athletic fields, the riverbank parking area, and the vacated street are turned over to a private school, what is to stop DeLaSalle from using this as a precedent to ask for ever more land for their campus and their use? What will be the tipping point that will turn the Island into just another sports venue, with its attendant parking, heavy traffic, pole lighting, press box and public address system, and not the rural respite from city life that is expected in a Regional Park in the center of a Metropolitan area?

To the problem of limited parking, you can add the possibility of a slow, mile and a half long coal train crossing the Island, blocking the crossings at East and West Island Avenues for anywhere from 10 to 30 minutes if the train keeps moving, up to an hour or more if it has stopped for some reason. With half of the access to the rail overpass on Nicollet Street closed, you have a situation guaranteed to produce more than a few irate and frustrated motorists. There are up to 50 trains per 24 hour period crossing this mainline railroad track. There will be more traffic, at higher speed, when the North Star line is up and running on the same tracks. This has not been considered in the EAW. It should be.

Proposed Riverbank Parking Lot across from the field: This lot has variously been described as asphalt or porous pavers accommodating 82 cars. Park Board President John Olson, during a visit to the Island, told neighbors that the current sand and gravel lot should not be used as parking because anything leaking from the cars and buses goes directly into the river. This is not legal. It seems to me that a parking lot of any kind directly on the Mississippi River bank should certainly be illegal, especially in the Central Riverfront Regional Park. Would a porous surface similarly have the problem of directing any leaks from cars into the river? And how would a paved lot handle run off into the river?

The 1996 Nicollet Island Master Plan called for a bike and pedestrian trail from Boom Island, along the East River Bank to the pavilion and the Main Street trail. With an 82 space parking lot on this piece of property, a trail would be impossible. All visitors, whether pedestrian, wheelchair, bike, truck, school bus, city bus, or car, are now pushed together into the street because there is no trail and no sidewalk on either side of the street in the section between Grove Street and DeLaSalle Drive.

Fire and Police Access to the North Tip of Nicollet Island:

When Island residents were first informed of the proposed closing of half of Grove Street in early December of 2004, we contacted the Minneapolis Fire Department for information about fire access. According to Fire Chief Bonnie Bleskachek, DeLaSalle had already discussed the proposed vacation of Grove Street with her and she told them she had “no problem” with it. She told me that “the paper work hasn’t come through yet” (the vacation request), but that a fire inspector had looked at the situation and that response times would not be affected by the closing of East Grove Street. I talked to the Inspector Doug Hordyk later and was told that he had never looked at Grove Street, and

that nothing would be done officially until a request for the vacation had come through. Residents who are directly affected by this closing have never been contacted by the fire department. And there has been no official study concerning this vacation and the effect on emergency access to the North tip. There are many thousands of visitors to the Island, enjoying the views of the river, the open fields of wildflowers and grasses, and the historic houses. They come on foot, bicycles, Segway, horse carriage, wheelchairs, strollers and cars. They deserve the most expeditious help available for medical and life safety emergencies.

According to Chief Bleskachec, all fire vehicles are now directed to access the Island from West Island Avenue only and never to go down East Island Avenue because of the possibility that the East Island crossing may be blocked by a train. Without access to the Nicollet Street overpass by way of East Grove Street, it would be impossible for a fire truck to turn around. But, now, with East Grove Street open, the most direct and quickest access to the North tip is from East Island Avenue, whether there is a train or not. To NOW require fire trucks to use only West Island Avenue makes no sense and wastes precious time if there is a medical or fire emergency.

How can we trust that the safety of Nicollet Island visitors, residents and the historic houses are being taken into account when the fire chief has already made her decision based only on a request from the proposer and no input from the residents or the state fire marshal? To make this decision based on politics and not an actual study, using the state fire code, is unreasonable. Have police and ambulance services been notified of the possibility of closing East Grove Street, and their input sought?

I would like to request that this project proceed to an EIS to do the further study that this project clearly requires.

Thank you,

Judith Richardson

Robert Roscoe / Design for Preservation

1401 East River Parkway, Minneapolis, Minnesota 55414 612.317.0989 broscOE@earthlink.net

July 25, 2005

Marie Hauser  
Minneapolis Park Board Commissioner  
Minneapolis Park Board  
2117 West River Parkway  
Minneapolis, MN 55406

Dear Marie:

I am writing this letter to request that the DeLaSalle athletic field expansion on Nicollet Island not be constructed. As you know, Nicollet Island is a historic property as part of the Saint Anthony Falls Historic District. In general, the athletic field as proposed is incompatible with the landscape and structures on the island, especially the athletic fields' size, its required closing of Grove Street, the large obtrusive retaining wall, the distorted rise of topography, and the highly visible lighting fixtures that will greatly disturb the quiet character of the river environment.

Grove Street was platted in 1866, in the earliest beginnings of island settlement by western expansion of the United States. The ability of people walking about the island to comprehend the built and natural environment at eye level has always been a special quality of the island and forms an inherent aspect of the Nicollet Island's historical character.

The Minneapolis Park Board has always been a wise and careful steward of its properties that form an integral part of the city's heritage, but this proposal would be an unfortunate departure from the Park Board's long-standing service to maintain its cultural resources. Please re-consider your support for this enlargement that would be so out of scale and out of character with the special place Nicollet Island has been to the people of Minneapolis, the region and our state.

Sincerely,



Robert Roscoe



Robert Roscoe / Design for Preservation

1401 East River Parkway, Minneapolis, MN 55414 612.317.0989 bob@designforpreservation.com

November 15, 2005

J. Michael Orange, Principal Planner  
Minneapolis Planning Division  
Community Planning & Economic Development Department  
City Hall Room 210  
350 S. 5<sup>th</sup> Street  
Minneapolis, MN 55415-1385

**Re : Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic  
Facility Development Project, Nicollet Island, Minneapolis**

Dear Mr. Orange:

This letter relates to the draft EAW for the proposed athletic facility development project on Nicollet Island within the St. Anthony Falls Historic District in Minneapolis. As background, I served on the Minneapolis Heritage Preservation Commission (HPC) for 21 years and worked extensively on many historic preservation aspects of Nicollet Island during those years. Also, my professional work on Nicollet Island included design for renovation of 6 houses, one new infill structure, and one addition.

One aspect of the EAW immediately jumps out at me - the EAW either deliberately or inadvertently understates the issue by setting up components of Nicollet Island to be analyzed as discrete parts, not in the totality in which its historic importance lies. For instance, the EAW text implies that closing East Grove Street has no impact on the physicality of the houses or the historic district. The real issue is how its removal affects the historic integrity of the whole island. The EAW should consider the historical impacts of the proposed development within an embrace of the larger picture, which the developer avoids doing for its own purpose.

A key attribute of a designated historic property is its uniqueness. This attribute has been used over and over to describe Nicollet Island. Nicollet Island is the only inhabited part of Minneapolis completely surrounded by water. Sitting astride the Mississippi River at the head of Saint Anthony Falls, the island is a witness to the entire span of the city's history. The island itself functioned as a sort of fulcrum to leverage city growth from Saint Anthony across the river to land that became an upper Midwest prairie metropolis. Perhaps Nicollet Island's most unique characteristic is its enduring strength in a seeming self-preservation of its natural features amidst the dramatic alteration of the built environment on the island itself and the riverfront around it.

That strength has been guided by the hand of civic interest and dedication, which the City should apply today. In this case, the proposed athletic field is incompatible with the landscape and structures on the island, especially the closing of East Grove Street, the large obtrusive retaining wall, the distorted rise of topography, and the highly visible lighting fixtures that will greatly disturb the quiet character of the river environment. The proposed development is simply too big for this small island location. To evaluate

alternatives that would mitigate these significant environmental impacts, the City should require preparation of an Environmental Impact Statement (EIS).

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Robert Roscoe". The signature is written in a cursive style with a large, prominent initial "R".

Robert Roscoe

C: Dennis Gimmestad, SHPO  
Greg Mathis, Minneapolis HPC

From: thomas [rosex001@umn.edu]  
Sent: Friday, November 18, 2005 8:47 AM  
To: Orange, Michael  
Subject: Nic il.

Michael,

Thank you for herding the cats through the process the other evening.

I would like to stress that we as a group of residents--those on the Island and those in the near neighborhoods-- support the school and its various activities. We do , however, question the wisdom of placing activities with conflicting needs and agendas in a very small place. We agree the sports can be a positive force in youth development, but question the exclusive focus on these as single activities.

To the issue of traffic, parking and safety, to which I spoke--the concern of many is the problem of the trains as they block the crossings and the potential for concentrated activity to hinder the safe operation of fire and emergency vehicles. The traffic patters and figures give are, as I mentioned provided for standard daytime use, which is limited due to the Islands isolation. However, at such time when a game--football or soccer, plus the various other activities as happen during the warm months, can create parking on the narrow access to Grove St. and the Nicollet St. Bridge. I believe this needs further consideration.

Other aspects of the proposed project allow for a radical transformation of the site at the expense of the greater good of the public.

During each of the meetings the defenders of the project speak to the history and value of the school, no one denies that fact nor do we wish the school any ill. No one is against the needs of children or the positive effects of diversity. The concern is for the retention of what small green/open space remains in the Mississippi channel and the downtown area, a truly unique resource which could be used to great advantage by the school if it were interested in the history of place and its connection to the place of it own storied history.

I am not in a position to address the priorities of the school but the planning department to which you are connected can advise them of the problems inherent to particular sites, the problems of scale, the

availability of other resources, as well as the problem of committing to a course of action that will preclude more meaningful development in the future.

Thank you again for your evaluation of this issue.

Thomas Rose  
91 Nicollet St  
Mpls

**From:** Sheran, Linda [LS126480@ncr.com]  
**Sent:** Friday, November 25, 2005 1:02 AM  
**To:** Orange, Michael  
**Subject:** DeLaSalle High School Stadium

Dear Mr. Orange.

We have just purchased a home overlooking Nicollet Island and strongly oppose the plan by the city to provide park land to a private school to build a football stadium in a residential area. The noise levels would be unacceptable. Enjoyment of our home as well as our investment would be impaired. You are proposing to build a football stadium practically in our front yard. The EAW study estimates dBA noise level for homes in our condominium would be 76 which exceeds the noise standard of 65. Although we will be able to hear the loudspeaker in our homes, the EAW study indicates that no significant adverse noise impacts are expected. In other words, there is no problem if, while sitting in your home on a Friday evening you are forced to listen to play-by-play football calls on a loud speaker, bands playing, crowds cheering and shouting. Don't you agree this is unacceptable?

I understand this property was acquired by the city to provide a park for the community. I cannot understand how the Minneapolis Planning Commission can possibly think this plan benefits the community of people who live and work in the area. If this is to be a community park, you must consider the people who LIVE in the community. We are paying a significant property tax to be here. Our tax dollars are going to support this park. Please let us enjoy it.

Finally, I think of DeLaSalle as a fine school and a good neighbor. However, those charged with making Park Board's decision should have no connection with DeLaSalle.

Thank you.  
Linda Sheran  
150 2nd St. NE #611  
Minneapolis, MN 55413  
612-379-3002

95 W. Island Avenue  
Minneapolis, MN 55401

Nov. 23, 2005

J. Michael Orange, Principal Planner,  
Minneapolis Planning Division,  
Community Planning and Economic Development Department  
City Hall Room 210  
350 S. 5th Street  
Minneapolis, MN 55415-1385  
michael.orange@ci.minneapolis.mn.us

Dear Mr. Orange:

Here are comments on the draft Environmental Assessment Worksheet for the DeLaSalle athletic facility project, which I believe needs an EIS due to significant adverse effects on Nicollet Island.

1. (EAW 2, p. 1) The naming of DeLaSalle High School as sole Proposer raises questions about the appropriate status of the Minneapolis Park and Recreation Board in the EAW. The EAW describes the project as a joint project of DeLaSalle and the MPRB, and DeLaSalle and the MPRB appear as co-signers to the draft Reciprocal Use Agreement (EAW Attachment F). MPRB property constitutes half the acreage for the overall project. The MPRB is and would remain sole owner of the parkland to be developed as a parking lot to serve the stadium as part of the project as described in the EAW. The EAW names the MPRB as co-owner and co-user of the project. Is it complete and accurate for DeLaSalle High School to be named as the sole Proposer? In the interest of completeness, should the MPRB also bear the Proposer's responsibility for supplying reasonably accessible data for the EAW? How might the draft EAW information be more complete or accurate if the MPRB were also to supply data as a Proposer?
2. (EAW 5, p. 2) The complete project site is comprised of several properties now owned by DeLaSalle, the MPRB and the City of Minneapolis. Is the high school's address alone (One DeLaSalle Drive) the most accurate and complete project address for the EAW? Or would it be more complete and accurate to also include the addresses of the parcels owned by the MPRB: 100, 201, 220 and 224 East Island Avenue?
3. (EAW 6a and 6b, pp. 2-3) Is it accurate to describe the project as an "addition of a regulation size football field"? Since a regulation size football field already exists at the given project site address, would it be more accurate to describe the project as a reconstruction or replacement of a regulation size football field"?
4. (EAW 6a, p. 2) The project summary describes the new athletic field as being available for soccer "when not used for football." While the hierarchy of control of the facility is clearly stated elsewhere in the EAW as favoring DeLaSalle's use over public access, this appears to be the only statement of football having a priority over other uses of the field. What implications does football's primacy have for the project's fulfillment of MPRB, regional and federal recreational goals

and purposes of the park?

5. (EAW 6a, pp. 2D3) The project summary, meant to be of limited length, twice states the same information: that the use of the field will be shared by DeLaSalle High School and the Minneapolis Park and Recreation Board. The summary also describes the project only as an athletic field, with no mention of the stadium seating/press box structure or the parking lot, which the EAW defines elsewhere as parts of the project. Would a more complete and accurate project summary dispense with the repeated information in favor of including mention of each of the project's major elements?

6. (EAW 6b, p. 3) If the proposed facility would "allow DeLaSalle to host half of its season games and any potential post season games as home football games," is it accurate and complete to state that "During 2005, this would have been a total of 4 home football games"? According to information on the school's website, the varsity football team played eight regular season games and three postseason games in 2005, while the junior varsity football team played six games and the 9th grade football team played nine games, for a total of 26 football games. Even discounting postseason games, that leaves 23 football games, meaning that half of the season's football games would equal 11 or 12 games, not four. What implications does this discrepancy between four home games and 11 or 12 home games have for other areas of the EAW?

7. (EAW 6b, p. 3) The statement that "The new athletic facility will allow DeLaSalle to É practice for those games, on the DeLaSalle campus" implies that the school's existing facility does not now allow football teams to practice for its games on the campus. Again, in EAW 6c (p. 5), it is stated that "the new facility will allow DeLaSalle to host home football games and practice for those games on its site for the first time in the school's 106 history." Is that accurate? Or does the existing regulation size football field (built in 1984, partly on Grove Street right-of-way) in fact allow DeLaSalle football teams to practice on campus? Would it be more accurate to eliminate mention of on-campus football practices as a new benefit of the proposed stadium?

8. (EAW 6b, p. 3) Is it accurate to call the two parcels of land mentioned in the first sentence of the second paragraph "adjacent"? Or would it be more accurate to say "two parcels of land and that portion of the existing Grove Street right-of-way É which divides them"?

9. (EAW 6b, pp. 3-4) What implications does the open question of field surface material (natural grass or artificial turf) have for the water quality issues raised in EAW 17, or for other parts of the EAW? Is the choice of playing field material still an open question as stated here, or is it "decided" in favor of natural grass as was asserted at the Nov. 15 public comment meeting, and as is implied later in EAW 6b ("The performance grass used for the football field," page 4)? What implications would the choice of natural grass have for the maintenance and use of the field for both soccer and football? For example, would the tendency for grass to become heavily worn in the soccer goal areas of natural grass fields have implications for the use of the new field for both soccer and football? How might MPRB and DeLaSalle soccer use be limited because of the primacy of football as stated in EAW 6a? Would it be more complete for the EAW to provide more

information, here or elsewhere, on the implications and criteria for the various field materials under consideration?

10. (EAW 6b, p. 4) The EAW states that "Goal posts will be placed on the site (refer to Attachment C, Site Plan)." However, neither Attachment C nor Attachment D (project elevations) shows goal posts. Would it be more accurate and complete for the attachments to show goal posts, particularly the drawing of the view looking toward the downtown skyline in Attachment D? Are goalposts a permanent feature, and if so, would goal posts be more accurate to include in the drawing than the smaller and potentially moveable soccer goals shown in Attachment D?

11. - (EAW 6b, p. 4) The EAW states that the "sole building construction will be the structure for the 750-seat bleachers, an enclosed press box, and storage facilities located under the seating." Would it be more complete to also include the two restrooms and maintenance room mentioned in EAW 13 and EAW 18? Would the stadium structure also house concession facilities, and if not, where would they be housed and would they require a structure or temporary structure?

12. (EAW 6b, p. 4) Are all the 166 parking spaces identified as being "in the present school parking lots" in fact on DeLaSalle property? Or are some of the spaces on MPRB property (such as at 6 Eastman Avenue), and if so, under what arrangement? How much of the "DeLaSalle parking" that the school would make available to the MPRB under Item 3.1 of EAW Attachment F ("Reciprocal Use Agreement") is already on park board property, or already covered by existing MPRB/DeLaSalle parking arrangements?

13. (EAW 6b, p. 4 and EAW 10, p. 9) The paragraph in EAW 6b about the proposed East Island Avenue parking lot and the table in EAW 10 do not appear to include a sidewalk or bike path on Parcel C. Would either be provided? Does the proposed parking lot allow the MPRB to fulfill its 1996 Master Plan design for that property?

14. (EAW 6b, p. 4) The EAW states that the "existing parking area between East Island Avenue and the River (Parcel C) is generally open to the public and provides over-flow capacity for public and private events at the Amphitheater," and "It is expected the MPRB will continue to keep the parking area open to the public." Would it be more accurate and complete to state that MPRB has posted signs at the entrances prohibiting public parking at the East Island Avenue lot, similar to the signs at the MPRB's other two parking lots on the island's south tip? And is it accurate to imply that public events continue to take place at MPRB's Nicollet Island Amphitheater, or in fact have all public events at the amphitheater (which as recently as 2001 attracted 10,000 people) been discontinued, following MPRB's granting a private firm exclusive rights to MPRB's pavilion building and adjacent parking lots?

15. (EAW 6b, p. 4) The statement that the project will be "ready for use in the fall of 2007" conflicts with the statement in EAW 21 (page 17) that "The athletic field is assumed to be fully operational by the 2006 football season." Which is accurate? What implications would an inaccurate "build year" have for the traffic study?

16. (EAW 6c, p. 5) The EAW asks the Proposer to "explain the need for the project and identify its beneficiaries." The Proposer's answer identifies MPRB as

benefiting from improved facility access for its recreation program and improvements to its parking lot, but offers no explanation or evidence of a public need. To be complete, the EAW should explain the public need for the project.

17. (EAW 6d, p. 5, and EAW 29, p. 33) Would a more complete and accurate response to EAW 6d and 29 examine the implications of the school's desire for other athletic facilities not included in the current project? What does DeLaSalle's record of land use decisions say about possible future stages of athletic facility development? The project proposed in this EAW would eliminate tennis courts the MPRB built for DeLaSalle just six years ago; yet tennis courts are included in the 1983 Agreement which the school's attorney states "DeLaSalle expects the Park Board to follow." Also, the project does not now include a softball field, yet such a field was part of the project design earlier this year (as a replacement for the softball diamond lost when the school built a new gym on top of what had been softball's left field). Last, the project does not include a running track described by landscape architects on the MPRB's recent DeLaSalle Citizens Advisory Committee as typical at the kind of suburban athletic facilities that DeLaSalle representatives have stated are the standard against which the school is seeking comparable facilities. DeLaSalle design drawings from the 1980s show campus athletic facilities on what is now MPRB property across the railroad tracks. What are DeLaSalle's intentions regarding expanding to include tennis courts, a softball field, a running track or other athletic facilities? If DeLaSalle says it has no designs on other nearby properties, can that response be relied upon to hold true for longer than the six years since the MPRB built tennis courts for DeLaSalle on the MPRB property where DeLaSalle now wishes to build a football stadium?

18. (EAW 6c, p. 5) What is the relationship between the proposed regulation size football field to be built over vacated Grove Street and the regulation size football field the school built over partially vacated Grove Street in 1984? How is the current project to place a DeLaSalle athletic facility on MPRB "Parcel B" related to athletic facility (tennis courts) that the MPRB built for DeLaSalle on Parcel B? A more complete response to EAW 6c would explore how the current project evolved from previous similar projects.

19. (EAW 7, p. 5) A more complete response would note how much of the 2.02 acres of DeLaSalle Parcel A was originally part of the Grove Street right-of-way, over which DeLaSalle constructed its current regulation size football field in 1984,

20. (EAW 7, p. 5) Would a more accurate response indicate use of the 25-foot-tall building? The 2,494-square feet of the building's footprint will by the nature of its ownership be of institutional use, and if concession space is included, commercial use.

21. (EAW 7, p. 6) How does a 25-foot-tall building compare in height to an average two-story building? Would a more complete answer offer the requested height comparisons to nearby buildings?

22. (EAW 8, p. 6) A more complete response would include two divisions of the U.S. Department of the Interior's National Park Service: the Mississippi National River and Recreation Area (whose management plan is cited in EAW 27, p. 28) and the National Register of Historic Places, which includes properties in National

Historic Districts, such as the St. Anthony Falls National Historic District, in which the DeLaSalle project is situated. In Minnesota, the State Historic Preservation Office reviews projects such as DeLaSalle's in National Historic Districts.

23. (EAW 8, p. 6 and EAW 27, p. 28) Does the Metropolitan Council's restrictive land covenant on MPRB's "Parcel B" property, which contains a prohibition against athletic fields, constitute a land use regulation? If so, a discussion of the restrictive covenant should be included in EAW 27.

24. (EAW 8, p. 6) Not included in this list is the MPRB's "no net loss" policy, which would require the MPRB to replace parkland put under long-term private control with equivalent parkland elsewhere. Could compliance with that policy constitute a form of financial assistance for this project?

25. (EAW 8, p. 6) Will the project also require approval of the Minneapolis Fire and Police departments, because closing Grove Street decreases access routes to the island's park and residential areas?

26. (EAW 9, p. 6D7) A complete response in the first paragraph would include other properties not acquired for, and not now included in, the regional park: the West Island condominium building at 31D53 West Island Avenue; the Nicollet Island Building apartments at 20 Grove Street; and the Grain Belt Beer sign property at 4 West Island Avenue. A more complete response would name the "existing rights-of-way" as belonging to the Burlington Northern Santa Fe (BNSF) railroad, Hennepin County's Regional Railroad Authority (RRA), and the City of Minneapolis. The second response paragraph is accurate in its reference to three multi-family residential structures, but again fails to mention the Grain Belt sign property, which remains in the possession of descendants of William Eastman (who in 1866 platted the island and laid out the streets in the pattern that remains intact north of Eastman Avenue, and built a mansion in the residential district that once covered the properties where DeLaSalle would build its stadium). The third paragraph of the response is more accurate in explicitly listing "railroad right-of-way" as among the properties not owned by MPRB (though again, naming BNSF and RRA would be more complete), but does not mention the city street right-of-ways, such as Grove Street, and again, the Eastman's Grain Belt sign property.

27. (EAW 9, p. 7) The statement that "Certain parcels acquired for the Park" in the early 1980s--including the Nicollet Island Pavilion--"were reserved for private commercial use" implies inaccurately that the pavilion building was private from the outset of MPRB ownership. The pavilion was in fact owned and operated by the MPRB as a public park facility (including public restroom facilities, drinking fountains and picnic tables inside and out) which the MPRB also made available for public and private functions. Only in 2001, 20 years after it was granted funds to buy the former boiler factory building, did the MPRB grant a private company exclusive rights to operate the pavilion.

28. (EAW 9, p. 8) It is inaccurate to say "The existing DeLaSalle High School campus has been on Nicollet Island since 1898" because the existing DeLaSalle campus did not exist in 1898. When the school now called DeLaSalle began, it occupied a single building in the midst of a dense residential neighborhood. Over the years, the mansions and most of the townhouses in that part of the

neighborhood were demolished as DeLaSalle's campus expanded to take their place.

29. (EAW 9, p. 8) For accuracy, the second response paragraph on page 8 should clarify that "The MPRB land" refers only to Parcel B, not the MPRB's land along East Island Avenue which the project would develop as a parking lot ("Parcel C").

30. (EAW 9, p. 8) For completeness, the second paragraph on page 8 should explain that the trees on Parcel B were planted as part of a University of Minnesota/Tree Trust long-term forestry experiment in 2000. Volunteers from the university, the neighborhood, and DeLaSalle planted the trees, each of which carries a tag with its species and ID number for the research experiment. A plaque placed on a boulder explains that the trees celebrate "Beautiful 'U' Day" and mark the 150th anniversary of the university's founding at a nearby site.

31. (EAW 9, p. 8 and EAW 25, p. 26) To be complete, the EAW should explain that the land immediately north of "Parcel B" is in fact two railroad right-of-ways. The Burlington Northern Santa Fe's right-of-way contains two sets of tracks used by freight trains and soon to be used by Northstar Commuter Rail trains. Lying between the BNSF right of way and Parcel B is another right of way owned by the Hennepin County Regional Railroad Authority (RRA), which has since the early 1990s had plans to build a Northeast Corridor light rail transit line there. (The overpass bridges up and down the rail line, including Nicollet Street, have been designed and rebuilt with an extra span enclosed in removable walls to allow for the third set of rails for the Northeast Corridor LRT.) The statement in EAW 25 that "the proposed new construction does not appear to have an impact on the St. Paul and Pacific Railroad" doesn't mean much, since that railroad company has long since ceased to exist. Has the Proposer consulted with the current railroad right-of-way owners, BNSF and the RRA, about the project? What do those railroads say about the project and its implications? Is the project as proposed bounded by the northern edge of MPRB land or does it extend onto the Regional Railroad Authority right of way?

32. (EAW 9, p. 8) For completeness, the paragraph about housing off the island should include the new townhouses along Main Street NE, between First Avenue NE and the railroad tracks. They would face the DeLaSalle field and stadium bleacher/press box building directly across the East Channel of the river.

33. (EAW 9, p. 8) For completeness, the statement "This new activity has the potential for conflict with residential uses" should be amended to include Nicollet Island Park visitor uses, with which the stadium activity and physical presence also will conflict.

34. (EAW 10, p. 9) The table seems to suggest that no sidewalk or bike trail will be constructed along E. Island Avenue as part of the project. Is that accurate? How much of Parcel B is indeed gravel? Would it be more accurate for the table to include information on the project as defined in EAW 6b--including the parking area and the various possible field surface types still under consideration? Without those, the Total line cannot give an accurate summary of the project's cover types.

35. (EAW 11a, p. 9) It is not accurate to say that the project site "was the area of earliest urban development in Minneapolis"--the towns of St. Anthony and

Minneapolis were established on opposite banks of the river years earlier--but the island does represent the most intact example of early urban development in the city. That is a main reason it has been developed and preserved as a park and a historic district. Also, initial urban development of the site dates back about a decade less than the 150 years cited. Grove Street, for example, was laid out about 140 years ago as part of the island's historic urban street pattern which has remained intact north of Eastman Avenue.

36. (EAW 11a, p. 9) It is inaccurate to say "No ecologically sensitive areas or natural areas remain on or near the site." The riverbank along the parking lot site is susceptible to erosion. The meadow and trees on Parcel B constitute a natural area, as does the slope along the East Island Avenue edge of DeLaSalle's current regulation size football field.

37. (EAW 11b, p. 9) Bald eagles are regular visitors to the area of the project site, and are classified as threatened in Minnesota. The EAW should investigate whether other endangered, threatened or special concern species are present in the project area, and complete the rest of EAW 11b.

38. (EAW 14, p. 11) For clarity, it would be helpful if the EAW could describe which "half of the site is within the Shoreland Area of the Mississippi River." Also, for completeness, it would be helpful if the EAW would describe in greater detail how specific policies of the City's 2003 Draft Mississippi River Critical Area Plan bear on the project area, since this Plan is also referenced in the response to EAW 27, where the reader is directed back to EAW 14. How does the project fit or not fit the passage quoted from page 65 of the plan? If "many of the policies of the É Plan address performance standards for activities in the Corridor rather than specific recommendations," is it also true that many do not? Are there specific recommendations that might apply to the project area other than the passage quoted?

39. (EAW 16, p. 12) Are there exceptions to the statement that "There are no naturally occurring steep slopes on this site"? Would the riverbank, the embankment along the Nicollet Street Bridge, or the short slope from the existing DeLaSalle regulation size football field count as steep slopes? (Note that EAW 16 asks for "steep slopes," not "naturally occurring steep slopes." As it happens, the original natural rise in the middle of the island was noted by early settlers, and later by children who rode sleds down the hill in the area of the project site.)

40. (EAW 18a, p. 13) What will be the public access to the restrooms and drinking fountain (in view of the loss of public access to MPRB restrooms when the Nicollet Island Park Pavilion was privatized in 2001)?

41. (EAW 21, p. 15) Does the traffic study consider soccer traffic or potential conflicts with simultaneous events at DeLaSalle, the stadium, the Nicollet Island Inn and the Park Pavilion? How do we know that varsity football games will generate the heaviest traffic? Might all-day soccer tournaments on the three youth fields also generate heavy traffic? Might a non-sports event attract more?

42. (EAW 21, p. 16) What is the bicycle and pedestrian traffic on Nicollet Island? What will happen to bicycle and pedestrian traffic on East Island Avenue? Will a bicycle trail be constructed or does the East Island parking lot preclude that feature of the 1996 MPRB Master Plan? At which fields did the Sept. 9 football

games that were measured take place? Are any of them on an island? What special traffic considerations does the island location demand?

43. (EAW 24, p. 22) No violations of noise standards have been attributed to crowd noise, but what about loudspeaker sound? What might the experience of stadiums such as Benilde-St. Margaret's in St. Louis Park say about the likelihood of noise pollution from loudspeakers on Nicollet Island?

44. (EAW 25, p. 23 and EAW 30, p. 33) The response ("No") to EAW 25's question, "Other unique resources?" is inaccurate and incomplete. Nicollet Island itself constitutes a unique resource that would suffer significant adverse impacts if the project is built. It is unique both as an inhabited urban island in the Twin Cities, and as a place that is unlike any other, offering a combination of urban and semi-rural environments that visitors find special and sublime. Evidence of the island's uniqueness is abundant. Taking three random examples: In "100 Places Plus 1," a book published by AIA Minnesota, Nicollet Island is said to feel "like it's from another time and place." In a recent WCCO television news broadcast called "Finding Minnesota: Nicollet Island" (online at: [http://wcco.com/local/local\\_story\\_308094107.html](http://wcco.com/local/local_story_308094107.html)), the reporter says of Nicollet Island that "By the 1840s, some residents of what was then the Village of St. Anthony made their claim to this unique real estate." In a song titled "Nicollet Island" (online at [www.susstones.com/mp3/nicollet\\_island.mp3](http://www.susstones.com/mp3/nicollet_island.mp3)). local recording artist Christian Erickson describes "sitting watching the river go by/no place in the world I'd rather be/just you and me and the cool Nicollet Island breeze É if you ask me, I wanna know, is it gonna be the same tomorrow?" The answer to the song's question could be "Yes", if the City of Minneapolis recognizes that the DeLaSalle project would have significant adverse effects on Nicollet Island Park and the St. Anthony Falls National Historic District. I urge the City to ask for an Environmental Impact Study to consider alternatives and thoroughly study the project's effects on this unique resource.

Chris Steller

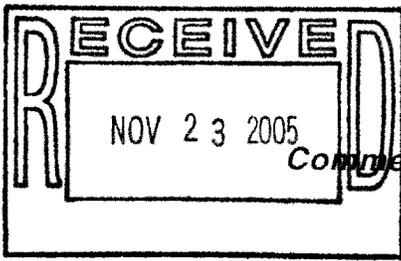
From: Christine Viken [c1900@sihope.com]  
Sent: Thursday, November 17, 2005 12:50 PM  
To: Orange, Michael  
Subject: Fw: Is permit needed?

----- Original Message -----

From: "Yanta, Joseph J MVP" <joseph.j.yanta@mvp02.usace.army.mil>  
To: "Christine Viken" <c1900@sihope.com>  
Sent: Tuesday, November 15, 2005 12:26 PM  
Subject: RE: Is permit needed?

> >From the Corps of Engineers, Section 404 (Clean Water Act) permits  
> >would  
> >be  
> needed for any fill, grading, or other discharges of fill or dredged  
> material  
> in wetlands or other waters of the U.S., and Section 10 (Rivers and  
> Harbors  
> Act of 1899) permits would be required for any structure, dredging, fill,  
> utility line, or other work in, under, or above a navigable water (such as  
> the Mississippi). (Section 10 permits are generally limited to work below  
> the ordinary high water mark on the bank, although structures or lines  
> that  
> go over the water are regulated. Section 10 permits for bridges are  
> handled  
> by the Coast Guard rather than the Corps.)  
>  
> Minnesota DNR permits may be required (DNR Division of Waters - Metro:  
> 651-772-7910; Molly Shodeen handles most DNR river permits in the  
> Twin Cities).  
>  
> Local permits and approvals (including floodplain zoning, setback  
> requirements, etc.) may also be necessary. Check with your city  
> and/or county.  
>  
> Other agencies might be involved in permit review (including but not  
> limited  
> to the National Park Service - Mississippi National River and Recreation  
> Area, the State Historic Preservation Office, and the Fish and Wildlife  
> Service). We would coordinate with them, if necessary. Some permits may

> require archaeological or mussel surveys.  
>  
> Joint Federal-State-Local application/notification forms are available  
> from  
> the State Board of Water and Soil Resources website:  
>  
> [www.bwsr.state.mn.us/wetlands/wcaforms/index.html](http://www.bwsr.state.mn.us/wetlands/wcaforms/index.html)  
>  
> There are several variants of the form, depending on whether the work  
> just involves a waterbody (e.g., dock construction or dredging) or  
> whether it also involves some wetland fill. I can mail you copies of  
> the forms, too, if you  
> wish.  
>  
> Our website has a link to the forms, also, and provides other  
> information:  
>  
> [www.mvp.usace.army.mil/regulatory](http://www.mvp.usace.army.mil/regulatory)  
>  
>  
> Anyone can apply for a permit, although you need to have some sort of  
> real estate interest (ownership, easement, etc.) to do the work  
> legally. Do you own the island? If the island is in public  
> ownership, you need the approval  
> of the government agency that manages it. Some islands in private  
> ownership  
> are subject to flowage easements or dredged material disposal easements.  
>  
> If you have any questions, I will try to answer them soon. The next  
> few days, however, I will be in the field much of the time.  
>  
>  
>  
> Joe Yanta  
> 651-290-5362  
> 651-290-5330 (fax)  
>  
>  
> \_\_\_\_\_  
>  
> From: Christine Viken [mailto:c1900@sihope.com]  
> Sent: Tuesday, November 15, 2005 11:44 AM  
> To: Yanta, Joseph J MVP



*Comments on Environmental Assessment Worksheet  
for the De LaSalle Athletic Facility*

The Worksheet contains a number of inclusions and omissions. In some cases, the intent seems to be promotion of De LaSalle's stadium concept.

While the proposer is entitled to present necessary information, the worksheet is represented as a product of Planning Staff. Following are details of inclusions and omissions that staff should review as to whether such inclusions are appropriate and whether omissions could be rectified within the context of an EAW.

**6 b.** Asks for a complete description of the proposed project emphasizing construction, significant demolition, etc. However, after the first sentence, the first paragraph contains details of the proposal for the Park Board and De LaSalle to share the field. This paragraph has nothing to do with the construction.

It belongs under 6 c. (Explain the project purpose; if carried out by a governmental unit, explain the need and identify its beneficiaries. )

The description of Parcel C omits the fact that the "sloped grassy area" has been planted with number trees as part of a test by the University of Minnesota.

Paragraph 4 states "field is proposed to be natural grass, but pervious artificial turf may be considered..." Either the project has to be evaluated with both options, or the proposer must state what is actually being proposed.

The "sole building construction" is only described as a "structure for 750-seat bleachers, etc. with a referral to Attachment C, Site Plan. Missing are any dimensions to enable assessment of width, height -- anything to give an idea of size of the structure. Those facts are not presented ANYWHERE in the worksheet.

Paragraph 1, page 4 also leads off with a 3-sentence explanation of the project that belongs under 6 c. - project purpose. The remainder of the paragraph describes proposed improvements to the MPRB parking lot to include porous pavers. The description of the current gravel surface of the lot as impervious seems to be in error. Also, since the attached reciprocal agreement calls for a bituminous parking surface, the question of who would be responsible for the cost of the upgrade would need to be answered.

**7.1 Project magnitude data** Only the footprint and height of the structure for bleacher seating is listed with NO OTHER dimensions. This missing information needs to be provided in order for the project to be evaluated.

**If over 2 stories, compare to heights of nearby buildings.**

The information to compare the 25 ft. structure to nearby building heights is missing.

**8. Permits and approvals required List all known local, state and federal permits, approvals, modifications of existing permits, governmental review, etc.**

The following are missing but would seem to be indicated for review and/or permits and approvals due to the location of the project within their jurisdiction:

-- Planning Department previously received an email from the U. S. Corps of Engineers indicating the need for assessment.

Nicollet Island is within:

-- Mississippi National River and Recreation Area

-- Mississippi River Corridor Critical Area

-- St. Anthony Falls Historic District

-- The Riverfront Development Coordination Board (RDCB) oversees coordination of Interagency Activities

Point 9 seems to have been repeated in error, and the first paragraph response is repeated in more detail following the second listing. This appears to need an edit to remove the duplication.

**9. Describe current and recent past land use and development on the site and on adjacent lands. Discuss project compatibility with adjacent and nearby land uses. Identify potential hazards due to past site uses.**

The paragraph description of land ownership needs clarification. As it stands, the statement doesn't make clear that about 1/3 of the Island population lives on land that is privately owned -- not owned in any way by the Minneapolis Park Board. And the fact that all the rights-of-way (streets) are owned by the City of Minneapolis, and not the Minneapolis Park Board, also needs clarifying.

There is NO information to explain the past and present uses of those parcels owned by the MPRB (Nicollet Island Inn, The Pavilion, residences, Amphitheater) even though there are significant ground leases that govern the use of all of these properties. The terms of these leases should be identified as part of this worksheet.

Also, there is no explanation of acquisition of the land purchased by the Metropolitan Council for a Regional Park, and no identification of the restrictions that govern the use of regional parks (i.e. not to be used for athletic fields.) This constitutes a special type of hazard in that this proposed use may necessitate reimbursing the Met Council for the land in question.

If the worksheet includes information on the 1983 agreement that laid out some of the terms of the regional parks development, the worksheet would be incomplete if it did not also present information of the broader picture presented by the 1983 agreement.

And, subsequently and most significantly, the worksheet includes NO discussion of the project COMPATIBILITY WITH ADJACENT AND NEARBY LAND USES. This is a crucial aspect of the worksheet and must be addressed.

Nicollet Island is a small regional park entirely in a local, state and national historic district, which lies within the Mississippi River Corridor Critical Area. Its past, present and future use must be compatible with those designations, as well as the other adjacent land uses.

The current burgeoning development of the River Corridor for residential use also has a bearing on the compatibility of the proposal with surrounding land use. The 6-to-8 floor condominium (not apartment) buildings, plus the newly occupied townhouses that front on the east bank have not been specifically evaluated as to impact of this project.

All of these newly constructed buildings were not built with the impact of the noise and light from this project projected onto the specifications. Yet, due to the effect of sound moving across water, they will have more sound impact than virtually any Island residence.

**Athletic fields are allowed as conditional uses in residential zoning:**

According to the zoning code specific standards, the athletic field shall be at least fifty feet from the nearest property line of a residential use. Is the distance to the property line at 20 Grove Street?

**Identify potential environmental hazards due to past site uses:**

Though past uses of the land in question contained homestead (see Archeology report), which could indicate the presence on abandoned wells and/or fuel tanks or gas lines, that possible hazard is not identified. This land is owned by the Proposer and to date has not been identified as being part of an environmental investigation, unlike the MPRB land.

**10. Cover types:** If the pavers which currently surface Grove Street constitute an pervious surface, that correction needs to be included.

As previously noted, the pervious/impervious nature of the surfacing has not been specified, so the impact of development of parking at this location cannot be determined. The project would have to supply the information for an Environmental Assessment.

If the parking lot is declared to have begun to produce an area of stormwater runoff that is eligible for an assessed fee, the information is not presented as to would be responsible for payment of that fee.

#### **11. Fish, wildlife and ecologically sensitive resources:**

The response ignores the fact that there are restored natural areas on and near the proposed site. The project would destroy a University of Minnesota tree planting experiment located directly adjacent to the tennis courts.

#### **14. Water-related land use management district -- discuss project compatibility with district land use restrictions.**

The worksheet states that the project will comply with the special conditions in section 55.490 of the Shoreland Overlay District dealing with conditional uses, but it contains no explanation of how it will comply.

The Island is located within the St. Anthony Falls Historic District. Bulletin 15 1995 of the National Register of Historic Places states that a district "possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development . . . a district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources."

Protecting such historical assets is part of the goals within the Critical Areas of which Nicollet Island is a part. However,

-- the worksheet does NOT address how the plan is compatible with the City's Critical Area guidelines for Urban diversified district that state: **B. 2. b** "The lands and waters within this district shall be used and developed . . . to protect historical sites and areas, natural scenic and environmental resources; and to expand public access to and enjoyment of the river."

-- the worksheet does NOT address how the plan is compatible with Executive Order 79-19 of the Mississippi River Critical Area Corridor which states under A. Purpose and responsibility, 1. c. To preserve and enhance its natural, aesthetic, cultural, and historical value for the public use, and 1. e. To protect and preserve the biological and ecological functions of the corridor.

Paragraph 3 refers to the City's Critical Area Plan regarding Nicollet Island: the plan "would encourage development of a variety of recreational facilities and opportunities that are river-oriented and that enhance the environment," but does not address how the proposal is compatible with that plan.

## **17. Water quality: Surface water runoff**

Does not address the runoff created from the parking lot.

## **19. Geologic hazards and soil conditions**

The issue of limestone formations or karst conditions has not been addressed. In light of the history of this area, with caves, tunnels, mill races and the historical record of collapses of same, this issue needs serious study and documentation before the project proceeds.

## **20. Solid wastes, hazardous wastes, storage tanks**

c. There is nothing addressing the storage of fuel on site during construction is one of the river's most vulnerable areas.

## **21. Traffic**

The proposer is unable to meet zoning requirements for minimum parking for its private use as a stadium to seat 750 without the incorporation of public land. The worksheet does not address how is this dedication of public resources benefits the public.

The draft Travel Demand Management (TDM) Plan's use of 1,000 vehicles per day Met Council suggestion for capacity of a two land residential street does not address  
1 - the peculiar "captive" nature of traffic flow on Nicollet Island;  
2 - the fact that the area is a park; and 3 - the concentration of the traffic flow within very narrow time periods.

Considering that the Park Board already closes Nicollet Island to all traffic except that of occupants during peak events such as Fourth of July and others, there are indications that the TDM study is of crucial importance to Island users. The information and assessments in the worksheet do not sufficiently address the concerns that could be addressed in an Environmental Impact Assessment.

The worksheet points out that De LaSalle will benefit from the development of the Park Board owned gravel lot at East Island Avenue because it will use the parking for "other events the school holds year round," but it does not address the public benefit of the dedication of public land to serve the needs of a private user, or how the public is to be compensated.

The TDM does not assess the impact of current development in progress that will affect the same intersections, i.e., Hennepin & 1st Street N, Hennepin & Main, etc. Traffic studies for those projects show projected service levels of D and E without adding the traffic from the athletic field.

The projects to be factored in include: Phoenix (Diageo Development), Pillsbury A Mill Development, Southeast Minneapolis Industrial (SEMI)/Bridal Veil Redevelopment, Mississippi Whitewater Park and the downtown Eclipse Project located just three blocks from Nicollet Island.

Information from the projects must also be considered under **29. Cumulative impacts: Minnesota Rule part 4410.1700, subpart 7, item B requires that the RGU consider the “cumulative potential effects of related or anticipated future project” when determining the need for an environmental impact statement.**

**Vacation of Grove Street:** The closing of Grove Street removes the east/west trail connection for pedestrians and bicyclists. The proposer states that De LaSalle is planning to provide a trail connection through the site to replace this connection and also states, “It is anticipated the trail will always be open to the public.”

The worksheet lacks specificity as to how this can be accomplished during school and all other events. And, considering that access to De LaSalle’s current athletic field is fenced and locked, the worksheet lacks sufficient assurances that such a statement can and will provide the public with the necessary guarantees of access.

#### **24. Noise**

The worksheet states that De LaSalle does not currently have a marching band. It does not address the fact that currently De LaSalle students use highly amplified music at games, not the impact of that noise level.

The worksheet chart of Estimated Maximum Crowd Noise Levels illustrates the fact that the noise impact will be greatest at the east bank condos (76 dBA), reflecting the effect of sound traveling over water.

However, the worksheet’s attachment E on sound levels contours does not show the effect on east bank residences, despite this increasing impact off the Island.

An Environmental Impact Assessment is needed to consider how this will affect the liveability issues of those new neighborhoods consisting of construction not built to consider the noise and visual impact of a close-by athletic stadium.

#### **25. Nearby resources**

Historical resources: The worksheet notes that “An Area of Potential Effect (APE) has not been determined.

Attached is a letter from Dennis Gimmestad of the Minnesota Historical Society that indicates that the entire area of Nicollet Island is part of the St. Anthony Falls Historic District and under the review authority of the State Historic Preservation Office

( Attachment A )

(SHPO).

A review by SHPO would be part of the needed Environmental Impact Assessment.

Within a historic district, construction of inappropriate in-fill buildings can have an adverse effect of the district's feeling and character, and SHPO, although charged with protecting the state's historic resources, is not even listed as entity to be consulted with regards to the proposal.

The Historic Resources Survey is insufficient in the scope of its research (numerous studies of the Historic Resources are missing, most significantly 1 - the 1974 study by Foster W. Dunwiddie, FAIA, as part of the Nicollet Island & East Bank Urban Renewal Project for the Minneapolis Housing and Redevelopment Authority and 2 - the previous 1961 report by Barton-Aschman Associates, Inc, St Anthony Falls - Nicollet Island, commissioned by the Downtown Council of Minneapolis.

These reports delineate the depth and breath of the historic resources that Nicollet Island represents. The omission of these and other relevant sources call into question the recommendations of the Zellie Historic Resources Survey.

Thus the worksheet reduces the Nicollet Island Residential Area, a unique resource widely studied and respected, to one paragraph and reports that, according to Zellie's assessment, "the proposed new construction does not appear to have an impact on the Nicollet Island Residential Area.

The worksheet and Zellie's report fail to present any criteria for that evaluation.

In contrast, the Advisory Council on Historic Preservation defines adverse effects as including 1 - change in the character of the property's use or setting, and 2 - introduction of incompatible visual, atmospheric, or audible elements.

An Environmental Impact Assessment could provide the competent survey of the historic resources represented by Nicollet Island. This information is needed for an assessment of this proposal and is sorely lacking in this worksheet.

Foster W. Dunwiddie, in an August 15, 2005 submission to the MPRB, pointed out that failure to subject a project within this National Register Historic District could result in the City of Minneapolis having to reimburse the Federal Government for expenditures to date. (Attachment B)

Substantial federal, state and local funds have been spent to preserve Nicollet Island's historic resources, as well as within the entire Historic District. Actions that could threaten decerfication of a district would have tremendous area impact.

An Environment Impact Assessment is needed to evaluate this potential impact that is not even mentioned in the worksheet.

Vik...

### **Designated parks, recreation areas or trails:**

Nicollet Island falls under the Comprehensive Management Plan (CMP) for the Mississippi National River and Recreational Area (MNRRA). The proposed rerouting of pedestrian and bicycle routes should be reviewed under that plan, but this is not included in the worksheet.

The worksheet includes the wording of a 1983 agreement that is contested by principles in this issue without stipulating that there is a view that the agreement may be void or may have been fulfilled.

If this information is to be included in the worksheet, information as to the restrictions on use of regional park land (athletic fields are not permitted) and the information should also be included that the proposal may necessitate the reimbursement of the Metropolitan Council for the amount of purchase of the park land or its replacement.

The worksheet should be inclusive and not be allowed to be a promotional piece for the project by presenting only a portion of the information.

### **27. Compatibility with plans and land use regulations**

The area affected by the proposal is also within the Minneapolis Riverfront Study -- CPED.

The compatibility and explanation of how conflicts will be resolved has NOT been addressed in the worksheet, despite the incompatibility with the protection of historical resources that the various plans represent.

The worksheet develops Policy 6.3, 6.4 and 9.8 of the Minneapolis Plan dealing with recreation, parks and residential areas while leaving out 6.1 and 6.2 which support protecting and developing environmental resources "so that they contribute to resident's experience of nature".

Selective presentation in the worksheet is not appropriate when it demonstrates a bias for a particular outcome.

In contrast, the Nicollet Island Master Plan is referred to, but no attempt is made to address the incompatibility between the proposal and the Master Plan and how conflicts would be addressed.

The St. Anthony Falls Historic District and the Minneapolis Heritage Preservation Commission are referenced, but absolutely NO attempt is made to address issues of incompatibility with the proposal and how conflicts would be addressed.

### **Land use regulations:**

The proposal does not seem to meet Chapter 537.110 standards for separation from nearest residential property line (50 feet) and required parking (225 stalls).

### **31. Summary of issues**

That the worksheet conclusions as to historic impacts for one of the most fragile and most historic areas of the city are summed up in two short statements highlights the need for an Environment Impact Assessment.

Thank you for the opportunity for comment on the deficiencies with the worksheet.

Christine Viken  
1900 La Salle Avenue  
Minneapolis, MN 55403  
612-874-1900  
c1900@sibone.com

  
4/23/05



MINNESOTA HISTORICAL SOCIETY

October 27, 1993

Mr. Robert K. Volk, Jr.  
Department of Energy  
Institutional Conservation Programs Division  
Washington, D. C. 20585

Dear Mr. Volk:

Re: Energy Efficiency and Renewable Energy; Minnesota  
De LaSalle High School, Minneapolis (SHPO #93-4280)  
Immaculate Conception Grade School, Faribault (SHPO #93-4281)  
Storden Elementary School, Storden (SHPO #93-4282)  
Parkers Prairie Highway School, Parkers Prairie (SHPO #93-4283)  
Ames Elementary School, St. Paul (SHPO #93-4284)  
Humboldt Junior/Senior High School, West St. Paul (SHPO #93-4285)  
Webster Magnet Elementary School, St. Paul (SHPO #93-4286)  
Ben Mays Elementary, St. Paul (SHPO #93-4287)  
St. Francis Xavier Grade School, Buffalo (SHPO #93-4288)  
SHPO Number: 93-4280-4288

Thank you for the opportunity to review and comment on the above projects. They have been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

Based on the information provided, we conclude that the Storden-Jeffers Public School building does not meet National Register criteria.

The De La Salle High School is listed on the National Register of Historic Places as part of the St. Anthony Falls Historic District. Therefore, we need to review the plans for the proposed project in order to determine whether they conform to the Secretary of the Interior's Standards for Rehabilitation.

In order to complete our evaluations of eligibility for Immaculate Conception Grade School, Parkers Prairie High School, Webster Magnet Elementary School, Ames Elementary School, Humboldt Junior Senior High School, St. Francis Xavier Grade School, and Ben Mays Elementary School, the following information is needed for each property:

1. A brief history of the school.
2. Current photographs of the entire school building, including additions.
3. A sketch plan of the school, showing the construction dates for the various sections.

Vicki 10/31

October 27, 1993  
Robert Volk  
SHPO Number: 93-4280-4288  
Page two

If any of these properties are determined to meet National Register criteria, we will then need to review the proposed project plans.

If you have any questions regarding our review, please contact our Review and Compliance Section at 612-296-5462.

Sincerely,



Dennis A. Gimmestad  
Government Programs and Compliance Officer

DAG:dmb

cc: Pat Gustafson, Faribault Heritage Preservation Commission  
Beth Bartz, St. Paul Heritage Preservation Commission  
Martha Frey, Minneapolis Heritage Preservation Commission  
Homer Hrubv, Minnesota Historical Society

Attachment E

August 15, 2005

Statement by Foster W. Dunwiddie, FAIA:

In 1974, restoration architect Foster Dunwiddie FAIA completed a pivotal study of Nicollet Island's historical resources. It served as the basis for the subsequent preservation efforts on Nicollet Island. It was also a foundation for the 1996 Nicollet Island Master Plan prepared by Martin and Pitz & Associates.

Prior to the 1974 study, all of the Island's historic properties were scheduled to be acquired and demolished. The Island as we know it today came about only after years of a cooperative effort at the federal, state and local levels.

Unfortunately, neither DeLaSalle High School nor the Park Board has addressed the impact of the proposed football field facility on the historic character of the Island. A crucial issue is the encroachment and impact on its existing historic resources. Further, no consideration has been given to archeological elements that may be present on the site, including remnants of the William W. Eastman mansion, and the John DeLaittre residence. These and other historic residences at one time fronted on those portions of Grove Street that are scheduled to be abandoned in order to accommodate the proposed football field facility. Surviving artifacts from an earlier period in the history of Nicollet Island may also be present on the site.

Alternative uses are often proposed within National Register Historic Districts. Nicollet Island as a part of the larger St. Anthony Falls National Historic District is no exception. In each case, these proposed uses have been carefully evaluated for compatibility and appropriateness by the federal, state and local agencies having jurisdiction. The nearby Grove Street Flats is just one of a number of these properties. Since Federal funding has been used in the completed restoration of a number of existing historic properties on the Island, the Minnesota Historic Preservation Office in St. Paul is one of the agencies having jurisdiction. There also are others. To date all of these and other historic properties within the Historic District have been subjected to this review. The proposed football field facility is no exception and should also be the subject of their review and comment. Failure to do so could result in the City of Minneapolis having to reimburse the Federal Government for expenditures to date.

Upon further consideration, I am confident that an acceptable alternative solution can be found that will respect the historic integrity of Nicollet Island and the St. Anthony Falls National Historic District while meeting the future needs of DeLaSalle High School and the Minneapolis Park and Recreation Board. Clearly, the existing plan does not

> Subject: Is permit needed?

>

>

> I need to know if a permit must be requested for some work on an

> Island in the Mississippi, and, if so, who can file?

>

> Christine Viken

> 612-874-1900

>

>

**From:** Peter Johann Willcütt [peat@pipapeat.com]

**Sent:** Wednesday, November 23, 2005 4:25 PM

**To:** Orange, Michael

Dear Mr Orange,

As a resident of Minneapolis, and of Nicollet Island's North End, I hear from visitors and tourists more than anything how green our beautiful city is. They comment on the trees and lakes and abundant wildlife. I feel that the city should reflect upon this strong aspect of Minneapolis' charecter in their planning process. It would be a shame to have a visiting friend stroll past the proposed site of development and say, "Hey, Didn't there used to be a meadow here?" The charecter of Nicollet Island in my opinion is not that of chainlink fences and high powered light and sound systems, but that movement of river winds blowing through trees, the sound of barges on the river and the soft crow of the rooster and the sight old roofs covered in a blanket of fresh snow in the winter.

My best regards and many thanks,

Peter Willcutt

**Detailed Comments and Errata Regarding the DeLaSalle Stadium EAW**  
**Edna C. Brazaitis**

**Item 6(b).** I have been informed by Brian Rice, counsel for the MPRB, that the draft reciprocal agreement is not to be considered a final version and the terms of the agreement will not be negotiated in earnest until after the regulatory process is completed. It is my opinion that the agreement as currently structured may be unconstitutional and therefore should not be relied upon as a definitive representation of the potential uses of the facility.

In fact, even if it were a final version, what ever was contained in the agreement would not necessarily restrict its future use over the 70 years of the agreement. This is not a single use facility like a hospital which by design can only have one use. In their quest for revenue producing activities, both parties may consider booking it in every way possible to reap revenue. For example, with respect to noise, it is easy to envision how the facility could be used with far more impact. In fact, Minneapolis Star Tribune stated that music concerts would be held at the facility. It is easy to see that the faculty could be used for corporate events such as the Microsoft corporate event held this summer at the Pavilion, that had music, fireworks, alcohol and food. These alternative uses need to be discussed in the EAW, as they can easily be anticipated.

Errata page 4. the EAW states that the improvements would be "...replacing the impervious gravel surface." The current surface is "pervious" not impervious. It is not gravel, but the unimproved surface.

**Item 6c.** Comments relating to the term "at no cost".

The term "no cost" is misleading. While there are certain aspects to this project that will be paid by DeLaSalle, this project is hardly without cost to the MPRB or to the City and will likely cost the taxpayers millions of dollars.

First, the MPRB has incurred and will continue to incur substantial attorneys fees in working on this project and in defending its constitutionality. There are other many other costs that will be incurred both in staff time and out of pocket expenses.

Second, the public land that is being used for the facility is extremely valuable, ranging in estimates from \$1 to \$7 million. This will make the limited hours of use that the MPRB is currently scheduled to get from this facility some of the most expensive field time ever purchased, costing up to 10 times the cost it could rent premium space from suburban counterparts or what it charges when it rents its premium Neiman field space itself.

Third, the land was purchased with State general obligation bonds. Peter Sousen opined a while back that this use may violate the bond conditions and require that the money be paid back.

Fourth, the land was purchased with state money for the sole purpose of open space recreational regional park and is protected with a restrictive covenant that prohibits its use as an athletic facility. In order to build an athletic facility in a regional park, the MPRB would need to get the covenant released. In the extremely limited cases that the Metropolitan Council has allowed land to be taken out of the regional park system, they have required that land equivalent in natural resources to be added to the park. Such land, in the heart of downtown, if it can be had, will be extremely expensive to purchase. The cost of the substitute land will be in the millions of dollars.

Fifth, there are recent improvements made at public expense by either the MPRB or the City that are to be demolished, without repayment of those public expenditures. These include the street paved with upgraded pavers, the sidewalk and curb, the tennis courts, and the trees and other landscaping.

Sixth, by changing the nature of the traffic pattern on the island, the project will necessitate the city upgrading the railroad crossings, an expensive proposition. It may also require rework of the streets and sidewalks to separate pedestrians, bicyclists and cars or to accommodate those in wheelchairs.

Seventh, city may be forced to pay for injuries resulting from accidents that are likely to occur from putting such a facility in an inherently dangerous location.

Comments relating to the use of the facility by the MPRB. See discussion above in 6(a)

Comments relating to the last sentence of 6(c).

The last sentence in 6(c) needs to be reworked. I believe that the reference to the first home game in 106 years is inappropriate and misleading. It infers that practices cannot be held on the regulation size football field that DeLaSalle currently has. Since 1984, when the city granted DeLaSalle request to encroach on the city's property to build a regulation size football field, DeLaSalle has held football practices on its site. It also uses the field to play home Junior Varsity games. It is not clear if DeLaSalle even had a football program for all "106" years (or 105 years since they opened their school in October, 1900) or that DeLaSalle's current field did not "allow" home varsity games during the last 23 years of the "106" year period. For example, in the early 90's I attended a home varsity game at St. Paul Academy, one of the schools in DeLaSalle's football conference. Parents and supporters cheered from the sidelines. There were no bleachers or lights. DeLaSalle could have done the same with their field.

**Item 6 d. Future Stages.** DeLaSalle High School has stated in a document given to the MPRB that in January and March 2004, their Board authorized exploration of expansion of its campus to include athletic, recreational, and fine arts programs. In a presentation to

the MPRB, DeLaSalle indicated that it wanted a soccer field, football field, softball field, stadium seating, athletic storage, tennis courts, batting cages, performance shell, track and field pits.

In addition, DeLaSalle presented concepts to the park board that placed running tracks, tennis courts and other facilities on additional pieces of park property. A presentation to Nicollet Island residents showed a running track on the other side of the railroad tracks. The owner of 20 Grove Street has stated that DeLaSalle approached him about purchasing his site. There has also been mention of DeLaSalle building on the grassy area across from Grove Street Flats. Another trend is to “dome” high school stadiums. This could also be a subsequent stage. All of these potential developments should be included and the implications thoroughly discussed in the EAW.

Given that the total size of Nicollet Island is less than 50 acres, small changes can have a dramatic impact and it is extremely important to understand all the ideas and plans DeLaSalle has for the future, no matter how speculative DeLaSalle may claim they may be at this time. It is necessary to examine all the proposed developments examined as a whole to see what their impact may be on the resources, especially the impact on the Historic District, including Grove Street Flats.

#### **Item 9. Land Use.**

Errata: (Some computer formatting issues which I am sure that you have noted.)

Errata. The regional park is known as Central Mississippi Riverfront Regional Park. It includes B.F. Nelson, Boom Island, Nicollet Island, parkland along Main Street, Father Hennepin, and some other riverfront property. (Contrary to comments made during the comment meeting at DeLaSalle, there are picnic areas by the Pavilion, at Boom Island (including a shelter and restrooms). There is a playground at Boom Island.)

Errata. The land for the Grain Belt sign is still owned by the Eastman family. At the time of formation of the park, the Nicollet Island Pavilion was not reserved for “private commercial use”. It was a park pavilion like others such as at Minnehaha Falls. It had restrooms open to the public, water and other facilities. In fact the MPRB, turned down an offer to use it as a museum, citing that it would not have enough of a “public” purpose. It has been “privatized” within the last few years.

Errata: Grove Street Flats is located at 2 to 16 Grove Street.

Errata: 20 Grove Street is privately owned rental housing. It is not “an Affordable housing co-operative

Errata: DeLaSalle currently states on its website that it opened a trade school in October 1900 in following completion of a small building.  
<http://www.delasalle.com/about/dehistory.shtm>. I recall their celebrating their 100<sup>th</sup> anniversary in the year 2000. It would be helpful if DeLaSalle would provide the public

documentation about their activity dating to 1898 on the Island prior to that to date since it is causing a lot of confusion and has only recently arisen.

Errata: I also believe that the 1959 date for the acquisition of the property is incorrect. My impression from the Torrens certificate is that it is October 12, 1942. There is a memorial about the vacation of Eastman Avenue in front of the school on November 9<sup>th</sup>, 1959 which may be causing the confusion. It should also be made clear that in 1984, DeLaSalle asked for and received an encroachment permit on 1/2 acre of property from the city of Minneapolis to build an athletic facility on that property. That equates to approximately one half acre of city property.

#### Lack of Evidence of any Environmental Investigation.

The statement is made that “the MCDA and the MPRB conducted environmental investigation and, to the extent required, remediation, of the land they acquired in 1983, including the MPRB land that is part of the Project site.” The land where the current tennis courts are was acquired in 1986 by the MPRB in a condemnation proceeding. The MCDA was not the condemning party. I requested from the MPRB under the Minnesota Data Practices Act any documentation that they had on the site. I have not seen one document that referenced any environmental inquiry. I would think that it would be wise to ascertain what inquiry was made, if any. I would be most interested in seeing any documents that they provide.

This is especially true given the experience of the B.F. Nelson site, which was acquired around the same time as part of the same grant and has recently, due to neighborhood inquiry, has been discovered to be contaminated. The MPRB recently received an EPA clean-up grant for the site.

I have been told recently by someone who worked on the Island in the late 70’s that the land next to the river where the proposed parking lot is to be held another garage. I do not know whether or not the garage had an underground tank.

20 Grove Street which housed the Hertz truck garage had underground storage tanks. From time to time depending on various factors, there have been strange materials that have shown up on the walls of the limestone bedrock basement walls in Grove Street Flats.

**Item 11.** Fish and Wildlife Abound in the Area. While I am sure that others will cover this, wildlife is abundant in the area. People fish for small mouth bass, bald eagles land in the trees, hawks circle, river otters and beavers dive in the waters– and a wild turkey has pranced near DeLaSalle.

**Item 14.** Football Stadiums are not a River Oriented Activity that is Encouraged Next to the River.

I have not had the opportunity to review the draft Mississippi River Critical Area Plan. However, I assume that it also encourages the location of river related activities near the river. A football field is not a river related activity and as I have mentioned in the introduction, it is the exception not the rule in DeLaSalle's football conference that the school's stadium is located next to the school.

I have not had the opportunity to yet review the City's Critical Area Plan, but the language quoted, is the same as the Policy 12c from the city of Minneapolis Comprehensive Plan adopted by the Minneapolis city council May 8, 1981. After the portion quoted, the plan continues; "Limited parking facilities should be considered." Adding an activity that is really only accessed by car and requires the addition of parking right on the shore of the river would seem to be inconsistent with the plan.

**Item 17. It is not Possible to Evaluate the Impacts on Water until the all Phases of the Project are Examined.**

As stated above, it is not possible to evaluate the quantity and quality of runoff until all the anticipated phases of the DeLaSalle expansion have been evaluated. These would include the tennis courts, the running track and field facility, the softball field, and an arts building.

**Item 19. The Limestone Bedrock May be Problematic**

It is important to understand the nature of the limestone. In a presentation for the MPRB, DeLaSalle identified the shallow limestone shelf as an issue. Ted Wirth spoke at length about the troubles that he and the park board encountered with the fractured limestone when they build the improvements for the Boom Island park.

**Item 20. All aspects of Traffic and Parking have Not Been Discussed:**

**A Pedestrian and Bicycle Park User Perspective Needs to be used to Evaluate the Project. Streets are Used as Sidewalks**

When examining the effect on traffic on Nicollet, a different set of expectations and standards need to be used than would be used on the normal suburban or city street pattern. The park was designed to be appreciated best by pedestrians and by bicyclists. The park was to focus on new concepts of livability that provided items of interest for pedestrians and bicyclists that would draw them away from their dependence on automobiles.

Therefore the focus of the traffic impact should not be on cars but on the impact that this activity will have on the park visitor who is encouraged to visit by foot or by bicycle.

In 1992 to 1999, the public amenities of Nicollet Island underwent a major renovation. Almost all the public works, streets, sidewalks, curbs, gutters, storm sewers, lights,

utilities were redone. Extensive planning and discussion was undertaken with all the interested parties, including public works, the HPC and the utilities. DeLaSalle participated in and hosted most of the Citizen's Advisory Committee meetings that were held between 1992 and 1997. During those discussions, planners put forth a number of plans that would have separated bikes, walkers, cars, and rubber wheeled trolleys.

A spirited discussion was held over these topics including concerns about liability from accidents and the dangerous train crossings. There was not enough available space to provide separate paths for the different activities. In addition, parking bays, separate paths, and wide sidewalks did not fit the historical period that the island was attempting to represent. Due to the limited space available and the low traffic on the Upper (North) side of the island, it was decided not to have separate paths and to retain the narrow sidewalks. The East West sidewalks on Maple Place are in the 30" range, falling far short of the minimum 5 feet needed for a sidewalk. The assumption was that bikes, cars and people would continue to share the streets.

Historically, the island streets have been used by pedestrians. Park visitors seem to prefer to use the streets as side walks – as part of the Huckleberry Finn/ Mark Twain charm of the island. They can often be seen walking in a row in the street along West and East Island. People from the nearby handicapped accessible housing tour the island by wheelchair in the streets. DeLaSalle uses the streets for track and field practice.

The traffic study prepared by DeLaSalle indicates that the closing of Grove Street would increase daily traffic on the West and East Island avenue on the North end of the Island. While the increased traffic may fit within the Metropolitan Council's guidelines for an automobile centered community like Eden Prairie, it may have a dangerous impact on the pedestrian and bicyclist centered use of the Island for recreational purposes. The population in the downtown area near the park has exploded. The majority of individuals who have moved in are older adults who have moved here for livability factors including the ability to have a pedestrian oriented culture. According to the FHA, older adults rely on walking or bicycling as their primary transportation mode more than other age groups. "They often move around more slowly than they used to, have poor eyesight, hearing loss and a range of other disabilities. Despite these limitations, they are out there biking and walking around." Unfortunately, older adults are highly overrepresented in bicycling and pedestrian crash statistics. As a group, pedestrians and bicyclists comprise more than 14 percent of all highway fatalities each year. Pedestrians account for as much as 40 to 50 percent of traffic fatalities in some large urban areas. Adding more traffic to a pedestrian zone used by older citizens may prove tragic.

In addition to the closing of Grove Street, the traffic impacts of the described athletic and the myriad unknown uses would impact the pedestrian's and the bicyclist's enjoyment of the park who are there for quiet repose.

### Discussion of Abandonment of Important Bike Connector Path Needs to be Included

Left out entirely in the discussion, is the impact on abandonment of the important bicycle connector proposed between Boom Island and Main Street. The Island contains a major connection point between the bike paths that has never been finished. The area that is slated to be paved over for a parking lot was to contain the connecting bike path between Boom Island and Main Street. Without the bike path, commuter and recreational bikers will be forced on the street with the heaviest traffic from the athletic events.

### The Proposed 4 Foot Field Path is Inadequate and Dangerous.

The proposal by DeLaSalle for a 4 foot path along the railroad track, was an after thought to counter concerns about the loss of access around the railroad tracks by pedestrians and bicyclists. Instead of solving the problem it shoehorns a dangerous and totally inadequate path next to the railroad tracks.

First and foremost, it should be emphasized that this site is a regional and national park that is situated here because of the natural and historical resources. This park attracts visitors from the entire metro area, state, country and even from overseas. Taken from the standpoint of that park visitor, the suggested narrow visually unattractive path is a poor substitute for the current sidewalk up the hill that is visually open, wide, well lighted, safe and above all obvious to anyone that it is a way to the other side of the island. The sidewalk currently goes beside a meadow area. There are trees along side the sidewalk and a park bench to rest, mid-way up the hill.

The proposed narrow 4 foot path, would begin as an opening on a retaining wall on a private school's football field, which to a park visitor would suggest that it is private property and discourage entrance. It would have no visual clue to a park visitor, most often a stranger, that it was a path open to the public. Visually, once on the path it would seem to lead to a football bleachers not to a potential path around a train that may be blocking the street. It would be a visually uninviting walk along the railroad tracks next to the goal posts, perhaps along side artificial turf.

In addition, the new path would be dangerous. The importance of sight lines are stressed in the comprehensive plan. Instead of an open sidewalk with a clear visual field, this path will have dark corners between the bleachers and bridge wall where trouble could lurk. It is no secret that people ride the rails and Nicollet Island has always been a place where vagrants get off the train. The secluded pathway and the stadium with bleachers will prove to be an inviting place for vagrants to camp.

Another safety and potential liability issue is the width of the path. Due to a fatality, the current MPRB standard for a regional bike path is now 12 feet. The proposed 4 foot path is far too narrow to be shared by bicycles, wheelchairs, and pedestrians, often with

dogs. It is also unclear whether a bicycle on a 4 foot path<sup>1</sup> can take the sharp 90 degree corner that is proposed in the plan near the railroad bridge. In addition, per the FHA, the narrow 4 foot path is not wide enough for a wheelchair to turn around – 60 inches is needed at a minimum. If a person using a wheelchair is unable to make the hill and wishes to turn around, they will not be able to do so.

While there is a representation that this path would be open to the public, there is no guarantee that it will be. The field is essentially walled either by a wall, the retaining walls, a building, the bridge or the stadium seating. It would be very easy to add a gate to close off public access due to some concerns such as misuse by people with dogs, or an assault on a student. If that would happen, pedestrians, wheelchair users and bicyclists would lose access to the other side of the island if there is a train blocking the way, and be forced to take a very long detour.

#### No Mention of Effect of Closing Grove Street on Persons Using Wheelchairs and the Disabled.

The only public East – West pedestrian sidewalk across the island that is useable by a person in a wheelchair is Grove Street. Grove Street has a 5 foot sidewalk which is big enough to turn a wheel chair around. It even has room for a wheelchair user to rest half way up the hill near the tennis courts. Maple Place contains the only other public East-West sidewalk. Those sidewalks are as narrow as 30”, far too narrow for a wheelchair. The standard adult wheelchair is considered to be 26” (during the last decade wheelchairs have gotten bigger with some electric wheelchairs measuring 29.7”). There is not room to widen the sidewalks at Maple Place without reconfiguring the streets. By closing off Grove Street, there will no longer be an East-West public pedestrian sidewalk that persons in a wheelchair can use on the Island.

In addition, forcing the disabled and those in wheelchairs to take an inefficient route takes far more effort - 30% more for a person in a wheelchair and 70% more for a person on crutches or with artificial legs- than for pedestrian walking the same distance. To cross the island from East Island over the football field path, will require them to go out of their way one block past Grove Street to the path and then once on the path to double back one block. This will add two blocks to their trip but be almost the equivalent of 3 and a half blocks for a person with artificial legs.

#### The Comprehensive Plan says Keep the Grid – Do Not Close Streets

The closing of Grove Street, a street that has faithfully served the community since 1866, flies in the face of the Minneapolis Plan which stresses the importance of the street grid and restoring it when ever possible.

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<sup>1</sup> It is unclear how the bicycles would enter the path. It would seem inappropriate for them to enter off the sidewalk. The plans do not seem to show a curb cut for bicycles from the street at the path approach.

Section 9.13 of the Minneapolis Comprehensive plan states that:

*“The Traditional Street Grid.*

The residential street grid laid onto the city from its earliest days has provided yet another powerful organizing force for our neighborhoods. Since the first residents claimed title to land along the Mississippi in the 1850’s, the street grid has exerted a great deal of influence over land subdivision. The grid is a primary organizing element, easily understood and navigable by all, whether a neighborhood is familiar or foreign to the traveler. ...Maintaining the grid pattern of our streets and “healing” it by re-establishing connections wherever possible is a strong prerogative for the continued vitality of city neighborhoods. ... Being able to find one’s way through unfamiliar territory brings tremendous benefit to the urban landscape. Whenever possible, new development should correspond to the historical street grid pattern. “

“9.13 Minneapolis will restore and maintain the traditional street grid.

Implementation Steps. (selected)

Maintain the street grid as the preferred option while evaluating new development of potential street changes.

Restore the street grid whenever possible.

Restore the historic connectivity of street corridors by working with property owners and city agencies on reopening streets such as Nicollet at Lake.”

Grove Street Serves a Important Compass for Visitors

Besides Grove Street’s importance as a conduit for transportation, one overlooked important feature that it serves to park visitors is as a navigational tool. The Island is often a confusing place for first time park visitors who often stop residents to ask directions and questions. Sometimes, they do not realize that they are on an island. Grove Street as a connecting East West street that visually shows them a way to the other side of the island cannot be overlooked as being more important than signage to the visitor.

**Parking**

Planning Documents Suggest Parking Should be Restricted.

The thrust of planning documents since the 1980’s have focused on making Nicollet Island a pedestrian and bicycle focused area. Parking was to be limited to encourage the use of alternative forms of transportation. Per policy 12 (c) “limited parking should be provided on Nicollet Island and shared parking facilities should be considered.”

## TDI Conclusions on Required Parking Contradicted by their own Data

None of the studies done by DeLaSalle are for a DeLaSalle home game. I attended the DeLaSalle home game against Minnehaha Academy which was held at Benilde St. Margaret's. The game was overly lopsided (at one time DeLaSalle had around a 40 point lead) and may have discouraged attendance. The stands did not appear to be full. I counted 298 cars and one bus parked at one time.<sup>2</sup> I did not count cars at the point when the maximum number of cars had arrived. I also did not capture all of parking that occurred in adjacent residential streets which I understand is substantial.

While I did not undertake a car count of when fans arrived at the game, I was surprised to find as the TDI data showed that the majority of fans do not arrive at the beginning of the game. My impression is that the maximum parking impact is achieved closer to the end of the game. It is at that time that I observed the most "illegal" parking from individuals who tried to park close and rush to the game. (The TDI study concludes that only from 55% to 70% of the cars arrive before 7:30.)

It is obvious that a vehicle occupancy rate of 3.0 persons per car is incorrect for a night high school football game as it does not fit the actual data that both TDI and I collected. I saw many cars with only one occupant, a parent, who I assumed was arriving directly from work or after some other commitment. I saw many cars leaving with just 2 occupants. My impression is that the occupancy rate was closer to 2 and could have been lower. TDI projects that the number of cars at a Nicollet Island DeLaSalle game would be 250. However, the actual number of cars that they counted leaving the DeLaSalle/St. Agnes game during a certain window was 283. This is despite St. Agnes being a very small school with only 224 students and that neither St. Agnes nor DeLaSalle has their own field.<sup>3</sup> If one uses the number of cars that TDI counted that arrived before 7:25<sup>4</sup> and apply their factors (minimum 55%, maximum 70%), the total number of cars arriving at the DeLaSalle game they observed would be between 335 and 427.

Assuming that a stadium next to DeLaSalle will attract more of its student body, alumni and other supporters, the attendance should be greater than the game that I attended or the DeLaSalle game that TDI observed. While it may not reach the 427 cars that were counted before 7:30 at the Blake/Breck game, two schools with fewer students than DeLaSalle, it could easily come close. One has to remember that not all of the people parked at the game are in the stands. At the game that I attended there were people working the concessions and a number of participants who were playing games in the end zone or talking to friends in other areas. There were team buses and perhaps cars for players, referees, and coaches.

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<sup>2</sup> Benilde has public bus service from Minneapolis every 15 minutes and not everyone may have arrived by car.

<sup>3</sup> St. Agnes plays at Brooklyn Center.

<sup>4</sup> There are odd gaps in the raw data provided. It can only be assumed that they did not collect data from certain time periods or did not provide it. For example, the number of cars arriving and leaving are far different.

### Paving the Parking Lots will not Correct Parking Problem

DeLaSalle has increased its enrollment from 251 in the early 90's to a projected 700. Two additional lots have been paved on Nicollet Island, but that has not been enough to stem the tide of illegally parked cars during special events. As the river side lot is currently used for special event parking, paving it will not solve the problem or handle the increase in cars that are predicted from football games. Recent special events at the school have had cars illegally parked in fire lanes, in no parking zones on both sides of the street. Many of the stadium's advocates have objected when such facts have been brought up. However, they are attending the event and may not even be aware of how widespread the illegal parking is on the island and the potentially disastrous effect that it could have, for example, on emergency services that are trying, on an island with limited access, to reach an athlete injured at a game or to control a fire at the school. If, on top of this, a train stopped as they often do, and blocked both East and West Island, an emergency vehicle may not be able to reach a victim on the Upper Island in time.

### Other TDI Conclusions may be Suspect as Well

The conclusion supplied by the TDI on parking is belied by their own numbers. I have not checked any of the other data or observations in his report; but from casual observance such conclusions as the traffic from the Benilde lots most closely resembles the situation on Nicollet Island seem suspect. The conclusion from two days of weekday traffic analysis on the flow patterns of school traffic and assumption that most of the traffic to be relocated is school traffic flowing in a clock wise fashion does not fit my observation over the years. From my limited review, I suggest that the information be independently checked. The traffic and parking implications on Nicollet Island are more perhaps than a mere neighborhood nuisance, they can be life threatening,

Given what I saw at the game I observed, I predict that there will be a substantial parking on the Upper island streets. Much of this will be illegal, and given the narrow width of Maple place and Nicollet Street will pose an issue for emergency vehicles.

Use of the parking is on the upper island is made more dangerous because of the trains. People often become very frustrated after a special event at their inability to reach their car, if a train is approaching or blocking the road. We have seen people jog a mere feet in front of an oncoming train despite the flashing lights, we have seen people squeeze between box cars, and even pass a baby.

### **The Train – Dangerous Crossings – Deaths have Occurred**

30 to 50 freight trains a day cross the island on the Burlington Northern Santa Fe's main line. Many of these are long heavy unit-car trains that are hard to stop. Due to current high energy costs, shipping is moving to more efficient rail service and rail traffic should continue to increase.

While they are not supposed to, trains stop and block both grade crossings at the island. This can be due to traffic or accidents down the line.

The current grade crossings are unguarded and dangerous. There is only a flashing signal. There are no gates. Unfortunately, accidents do and have happened at these crossings. As a few examples, a grandmother and 2 year old child were in a car that stalled on the tracks on Nicollet Island and were hit by a train. In another incident, a man was found dead after being struck by a train.

Adding the Stadium to the Island will force the City to pay to upgrade the crossings by adding arms. Unfortunately, it is very difficult to prevent pedestrian train accidents and upgrading crossing have not been found to be effective in preventing accidents. Pedestrians underestimate the speed of trains and are often ignorant of how much time it takes to stop a heavy train. According to a recent MPR article, guarding seems to have limited effectiveness on reducing pedestrian deaths.

Unfortunately, placing the stadium next to this dangerous crossing invites accidents. Fans, especially teenage fans are often distracted and not using the best judgment. Teenagers often show off for their friends. Alcohol is often used.

Island residents have seen many near accidents – these near misses are more frequent at special events when participants are impatient to reach the event or their car. With neighborhood parking expected during games, a dangerous situation will exist that may lead to a tragic death.

This problem will only be made worst in the future. The tracks across the island are in bad condition and train traffic is limited to 25 miles an hour. However, the North Star commuter rail is slated to cross the island. As a result the track will be improved to allow the trains to travel faster. With higher speeds, the danger of a fatal accident also increases.

The density of the traffic on the tracks will increase as well. The North Star line is currently scheduled to add 9 trains a day. The Red Rock Commuter line is also planned to use the same tracks and would add to the traffic. The experience of the Burlington Northern Metra commuter train has shown that commuter rail significantly increases development along the corridor that it serves which in turn increases train activity. While, no one is predicting that commuter rail will be as successful in Minneapolis, currently 93 commuter trains a day serve the Aurora – Chicago Metra corridor.

#### **Item 24. Noise**

##### The Noise from the Stadium would Interfere with the Purpose of the Park

The noise emitted from the stadium has to be taken in context for which it suggested. Upper Nicollet Island was envisioned as a quiet peaceful part, a place that park visitors could retreat from the city. It was intended to be a place where park visitors could spend

time on contemplative endeavors and experience life from a by gone era. Installing a stadium with a loud speaker system is contrary to this intent.

Noise Standard Violations have been Recorded at DeLaSalle Home Games and Should be Expected

Unfortunately, contrary to the EAW, it is my understanding from counsel representing neighborhood residents that violations of noise standards have been recorded at football games played at Benilde St. Margaret's and that the worst violations were DeLaSalle's home games because they did not have a marching band and played loud music. It is unfortunate that no measurements of stadium noise for the EAW were taken at a DeLaSalle home game where noise levels may have been exceeded those measured at the Blake game. The loudspeakers were also used to play music for DeLaSalle's soccer games and the noise levels were unacceptable.

There are also some other inaccuracies. From the drawing, the 20 Grove Street Building would sustain loudspeaker noise between 66 and 68 dBA. The Brothers residence would also be exposed to 66 dBA. Since DeLaSalle does not have a marching band, it will be playing music through the loudspeaker system.

Given the experience at Benilde, it is likely that the music at half time performance combined with the crowd noise will exceed the L10 noise standards at 20 Grove Street and at the Brothers residence.

Errata, the Houses on the North side show 62 not 60 dBA as stated in the EAW.

Unfortunately, there are no appendixes to evaluate the calculations done by the consultant, to understand his methodology, the margin of error involved and the other basis for his conclusions. Therefore, it is impossible to adequately evaluate the conclusions.

Future plans should also be taken into account when evaluating the noise impact. 20 Grove Street was slated to be torn down and developed as housing compatible with Grove Street Flats. As such it would undoubtedly be higher than the present structure, and the residences would be exposed to more noise.

Other Uses such as Music Must be Evaluated.

It should be anticipated that this facility will be used for music. Large speakers can easily be brought in and used for other performances. Their large capacity could easily violate the noise standards.

The Amplifying Effect of Water must be Evaluated

As K.T. Simon-Dastych remarked during the public comment period, the effect of water has not been taken into account in the calculation. It is known that water can amplify

sound. This is a phenomenon that I have personally observed with the river, when someone playing a musical instrument on the opposite shore seems to be almost next door.

The consultant should be instructed to include those factors into the calculations.

## **Item 25.**

### The Stadium would have an Adverse Effect on Historic Resources.

First, the total extent of the proposed additions to DeLaSalle's campus have to be discussed before the potential impact on the historical resources can be determined.

The current project has a direct adverse impact on the District and specifically on Grove Street Flats. The view from the Flats up Grove Street will be blocked by the bleachers. This hill that was described in 1853 by one observer was "rounded as if by the had of art which seems to be waiting for a handsome mansion" will be crowned with a suburban style football stadium. Grove Street Flats will be isolated from its context, exactly what inclusion in a historic district is supposed to prevent.

I will assume that others will cover in depth the impact on the District.

### Parks – The 1983 Agreement Does Not Require a Stadium on Regional Park Land

The Project was not contemplated by the 1983 agreement to be on Regional parkland. In 1983 and continuing to this day, athletic fields were prohibited in regional parks and regional park funding could not be used to purchase land for or to pay for the development of athletic fields. As reconfirmed by the Metropolitan Council on page 22 of their 2030 Regional Parks Policy Plan, dated June 29, 2005, "Such athletic field complexes do not require a high-quality natural-resource base to exist... athletic field complexes are inappropriate for development on regional parks system lands." In fact this prohibition was pointed out by Counsel and thoroughly discussed by the MPOSC at their May 16, 1983 meeting to consider the Central Mississippi Riverfront Regional Park Development Master Plan and Acquisition Plan Amendment. The MPRB made representations to the MPOSC that any development plans of DeLaSalle to build an athletic field would "will not affect regional park land" and that "DeLaSalle is restricted to their present site." It was clear that the property in question could not be used for an athletic field. After the purchase of the property a restrictive covenant was put on the land that prohibited any use of the property except for "regional recreational open space purposes as those purposes are from time to time defined the Metropolitan Council."

The encroachment permit granted in 1984 which allowed DeLaSalle to build a regulation size football field on 1/2 acre of city property that was not purchased with state monies, satisfied the 1983 agreement.

As stated above in 6(b), there may be serious constitutional infirmities with the proposed draft reciprocal use agreement.

The 1996 Master Plan Did Not Contemplate an Athletic Field on the Proposed Location or the Closing of Grove Street.

The tennis courts were put on the site only at the insistence of DeLaSalle. The meetings leading up to the Master Plan were attended by and hosted by DeLaSalle. If they desired an athletic field, they had an obligation and duty to bring the issue up publicly at that time. They never did.

The plan adopted five categories of design and planning principles which were reviewed with the Technical Advisory Committee which included members of key governmental agencies including MCDA and the HPC.

While not quoting these principles in depth, it is clear that they did not contemplate the proposed project. In fact, the consultant Roger Martin, a distinguished professor of Landscape Architecture confirmed that building the project would destroy the delicate balance between the uses on the island would remove an important buffer between the school and the historic residential neighborhood.

The type of recreational activities which were encouraged were ones that would be “complementary to the region’s landscape and history.” Including such unique activities as croquet, carriage and sleigh rides, picnicking, lawn tennis and ...yearly sugarbush events, activities that would not conflict with the residential character of the island and would minimize impacts on private residents.

Development should:

1. Preserve and enhance significant vistas of the island from other points in the city.
4. Maintain the forested image of the island.
  - Reintroduce the maple/bass wood climax vegetation.

Circulation & Access should

2. Control traffic so as to be in scale with residential areas.
3. Maintain narrow road width and reduce land width to encourage slow-moving traffic.
4. Encourage walking and biking as the primary visitor activity at the upper island.
8. Provide safety controls at all auto, bike and pedestrian crossings of the rail corridor.

Design

The historic pattern of land use was to be used in the three zones. The area north of Grove Street including the subject property is in the “upper” zone.

2. Preserve the integrity of the original (1866) street plan of the island.
  - Minimize the introduction of curvilinear elements for public street design.
5. Minimize disturbance of the upper island:
  - Protect grades
  - Leave unbuilt lots open.

Scenic views and Vistas. There are significant scenic views of the island from both Banks of the river and the Hennepin Avenue bridge. The landscaped plaza at the new Federal Reserve Bank is designed to take advantage of these views while instructing the visitor as to the historic past.

### **Item 27. Compatibility with Plans and Land use regulations.**

It is clear that no plan put in place since the 1980’s encourages the placement of the proposed Stadium complex on Nicollet Island. It is against the core principles of planning for activities next to the river. It goes against the strong policy against closing streets.

The funding for this project came from the Metropolitan Council. As stated above, they have never allowed athletic fields in a regional park, which are established because of their high level natural resources.

A discussion of the Metropolitan council’s prohibition on athletic fields discussed above should be included in this section.

MNRRRA Plan. The MNRRRA plan has a set of design guidelines which suggest that this proposal would be inappropriate in a historical district..

Minneapolis Comprehensive Plan: I suggest that the following portions of the Plan be taken into account.

- 6.1 Minneapolis will identify, protect and manage environmental resources so that they contribute to resident’s experience of nature, the parks system and the city.

Incorporate protection, conservation and maintenance of the natural environment in he design and operation of parks, streets, open spaces and related facilities.

Encourage planting of native vegetation on parklands and green spaces.

Provide and maintain habitat for resident and migratory songbirds and waterfowl, and other wildlife.

- 6.4 Park Safety and Security.

“...The parks must be shown to be safe environments, free from the possibility of harm or threats to individual or community safety. Good design can accomplish a great deal to this end....visual sight lines have much to contribute to making parks safer, more secure places.

7.4. Minneapolis will encourage the planting and preservation of trees and other vegetation.

7.12 Minneapolis will play a leadership role in setting up examples and pilot projects (this would include the public private partnership that set up the 25 year tree study on the property.)

9.2 Minneapolis will continue to preserve the natural ecology and the historical features that define its unique identity in the region.

9.3 Minneapolis will support the preservation and expansion of the existing open space network, inducing greenway.

9.13 Minneapolis will restore and maintain the traditional street grid.

**Item 29. Cumulative Impacts.** As stated earlier, DeLaSalle desires further enhancements to its school including other sports and art activities which will require additional construction and land. It is important to understand what these future projects may be as taken as a whole they may have a devastating impact on Grove Street Flats and the neighborhood.

### **Item 30 Other Issues**

#### **Safety. Nicollet Island has Many Dangers.**

While Nicollet Island has a peaceful image, it has a number of inherent features that make it a dangerous place. They include the train, the water, the bridges, the caves, the dangerous current and the falls. These are not speculative dangers. Many people have been injured or died on the Island. One of the questions that should be asked is if it is wise to bring strangers on the island at night when it is difficult to understand the dangers. One mother told me that she would never send her child to Nicollet Island to play sports because of the dangers of drowning. It is a danger that it made worst because of the lack of judgment during teenage years, the tendency to follow up on dares, and often drinking. All of these can be accentuated during sporting events.

I only wish that these dangers did not exist; but I see the ambulances, and the rescue craft trying to save people or recover bodies. I have seen teenagers daring each other to jump from the railroad bridge. I personally have found a body that apparently fell from a bridge. And for those who diminish the risks believing that only vagrants are involved, I remember all too well, the recent case of Christopher Jenkins, the University of

Minnesota student who disappeared on Halloween. I met his father when he was valiantly trying to trace Christopher's steps on Nicollet Island and was searching in vain for people who might have seen him. I saw the bloodhounds that were brought in and tracked his last scent to Nicollet Island at the river's edge. I shutter to think about how his father felt when his body was found after the thaw trapped in brush right above the falls.

The caves that underlie Nicollet Island are another little known risk. An internet search will reveal bragging by those who have "explored" them. Unfortunately, as the tragic experience showed in St. Paul, these can be attractive nuisances which can lead to death.

**High Voltage Lines.** Mention should be made of the high tension voltage lines across the parking lot site.

Failure to Quantify the Economic Aspects. No appraisal has been done on the economic impact of the project. A report submitted with the EAW petition determined that the impact on Grove Street Flats and other properties would be substantial. It is important to understand this impact because of its potential impact on the ability to maintain the historic houses. The government has required that Grove Street Flats and the other historic buildings be maintained in accordance with certain historical requirements. Maintaining these properties in this manner is very expensive. A serious impact on the value of these buildings may impact the owners ability to invest the monies needed to maintain them in the manner that the City has mandated.

### **Summary of Issues.**

The proposal will have an adverse impact on the island from many aspects including traffic, parking and noise. It may have unforeseen impacts that may require that the infrastructure such as paths and sidewalks be changed. It will have an extremely harmful effect on the St. Anthony Main historic district.

It is the enacted public policy of the State of Minnesota to preserve historic resources and to set aside open space as regional parks for the benefit of future generations. I know of no public policy of the state of Minnesota that decrees that football stadiums must be located right next to private schools..

In fact, in the case of long established urban schools, finding an appropriate setting for an athletic stadium immediately adjacent to a school is seldom possible. DeLaSalle is not alone in this dilemma. In the Tri-Metro Conference of which DeLaSalle is a member, DeLaSalle, St. Agnes and St. Bernard's do not have football fields; the football fields for Blake and Minnehaha Academy are far from their senior high school; and Saint Paul Academy does not have lights. Many public school facilities, such as North High's field, are a distance from the school..

There are other locations nearby that should be considered for this facility that would not have the adverse impacts on the regional park or the historic district. During the recent

CAC, the two landscape architects, neither of which had ties to either DeLaSalle nor Island residents urged that other alternatives be considered because the project “didn’t fit” on the land.

As the impacts would be so strongly felt on the fragile nature of Nicollet Island, I ask that the City undertake an E.I.S. to examine the issues in more depth and to fully explore other alternatives that may have less of an impact.

### Number of Vehicles Entering School Lots for Varsity Football Game 9-9-05

Start Time	Benilde-St. Margaret's vs. St. Francis at Benilde-St. Margaret's	Breck vs. Blake at Breck	De La Salle vs. St. Agnes at Brooklyn Center High School
6:00 PM	6	19	6
6:05 PM	12	18	6
6:10 PM	16	6	9
6:15 PM	14	6	6
6:20 PM	20	15	14
6:25 PM	31	17	16
6:30 PM	25	20	22
6:35 PM	36	17	18
6:40 PM	36	28	18
6:45 PM	51	20	20
6:50 PM	72	40	28
6:55 PM	46	38	23
7:00 PM	48	43	29
7:05 PM	38	32	25
7:10 PM	29	19	14
7:15 PM	41	30	13
7:20 PM	33	24	8
7:25 PM	28	17	10
7:30 PM	32		

### Number of Vehicles Exiting School Lots for Varsity Football Game 9-9-05

Start Time	Benilde-St. Margaret's vs. St. Francis at Benilde-St. Margaret's	Breck vs. Blake at Breck	De La Salle vs. St. Agnes at Brooklyn Center High School
8:15 PM		1	
8:20 PM		13	
8:25 PM		6	
8:30 PM		8	
8:35 PM		9	
8:40 PM		6	
8:45 PM		4	
8:50 PM		5	
8:55 PM		16	
9:00 PM		8	
9:05 PM		20	
9:10 PM		22	5
9:15 PM		19	7
9:20 PM	63	29	6
9:25 PM	48	25	20
9:30 PM	27	28	56
9:35 PM	50	54	64
9:40 PM	117	56	55
9:45 PM	87	58	17
9:50 PM	66	31	5
9:55 PM	38	14	
10:00 PM	33	14	

## Total Projected Vehicles at Games from TDI Data

### Number of Vehicles Entering School Lots

	Benilde v St Francis	Breck v Blake	DeLaSalle v St. Agnes
6:00P			1
			13
			6
			8
			9
			6
			4
			5
			16
			8
			20
			22
			19
			5
	63	29	7
	48	25	6
	27	28	20
	50	54	56
	117	56	64
	87	58	55
	66	31	17
	38	14	5
7:30P	33	14	
Total Cars	<b>529</b>	<b>446</b>	<b>235</b>
Entering During Time Period			

### Projected Total Vehicles at Game per TDI formula

at 55%	<b>962</b>	<b>810</b>	<b>427</b>
at 70%	<b>776</b>	<b>637</b>	<b>336</b>

### Number of Vehicles Leaving School Lots

8:15P	6	19	6
	12	18	6
	16	6	9
	14	6	6
	20	15	14
	31	17	16
	25	20	22
	36	17	18
	36	28	18
	51	20	20
	72	40	28
	46	38	23
	48	43	29
	38	32	25
	29	19	14
	41	30	13
	33	24	8
	28	17	10
10:00P	32		
Total Cars	<b>614</b>	<b>409</b>	<b>285</b>
Leaving During Time Period			

## Pedestrian-train accidents on the rise

by [Bob Reha](#), Minnesota Public Radio  
August 17, 2004



Friends of a teenage girl killed at this pedestrian crossing in Moorhead, have left messages on the crossing gate as a memorial. (MPR Photo/Bob Reha)

**Over the last four years, 10 people have died at railroad crossing accidents in the Fargo-Moorhead area -- all of them were pedestrians. Some of the victims were elderly. One was a teenager. None of the accidents happened at crossings thought to be especially dangerous. None of the deaths appear to be suicides. The accidents have local officials shaking their heads and looking for answers.**

Moorhead, Minn. — Trains are a common sight in the Fargo-Moorhead area. As many as 70 Burlington Northern Santa Fe trains rumble through town each day. A double-track mainline runs through the two communities, like a center line on a highway.

A third track skirts along the north side of downtown. Since the land is flat, you can hear and see a train coming from a long distance. Under those circumstances, it's hard to understand how someone could get hit by a train.



"If someone's going to try and beat the train across, to save some time, it's still going to happen," says Sgt. Shannon Monroe of the Moorhead Police Department. Monroe says people are misjudging how fast a train is moving, and that is often a fatal mistake. Monroe remembers being called to an accident where a man in his 70s had been hit by a train. He apparently had not seen the train, and walked onto the tracks in front of the locomotive. A witness dialed 911.

### [Train crossings](#)

"The call was a cell phone caller, who was saying the person was coughing and stuff yet. Obviously it was a gory scene," says Monroe. "But there was a thought that the person could possibly be alive. We got there, basically it's 10, 12, blocks away, so we were there pretty quick. The person was gone already."

Monroe says people aren't paying attention. They're easily distracted. He says inattention and impatience are getting people killed.

"Everybody seems to be in a rush all the time. Everybody is running behind. It just seems to be a matter of people making poor decisions," says Monroe. "Taking that risk, thinking they're going to be fine. They try to beat it across the tracks as the arms are coming down. They see a train in the distance and they think they're timing it just right."



### [Memorial to a train victim](#)

What's happening in Fargo-Moorhead mirrors a national trend. Statistics from the Federal Railroad Administration show 898 pedestrians were killed or injured by trains in 2003.

Representatives of the Burlington Northern Santa Fe railroad say they are aware of the problem. Spokesman Steve Forsberg says most of the crossings in Fargo-Moorhead have gates to stop auto traffic. But few have gates at sidewalks, to stop pedestrians from crossing. He says there are plans to add safety gates for pedestrian crossings. But he cautions, adding the gates will not solve the problem.

"In an almost perverse way, it seems that we seem to be taking more risks. Our train crews can tell on numerous occasions how many near misses they had. Only the collisions are making the news," says Forsberg. "What never makes the news is the number of near misses there were by people who took the risk and managed to miraculously avoid the fatality."

Forsberg says on average, 12 people or vehicles are struck by a train each day in the United States. Forsberg says the best way to address the problem is with education.



### [Railroad sign](#)

Leann Wallin works for the city of Moorhead's engineering department. She's also a certified instructor for the Operation Lifesaver program, which was founded 30 years ago by two Union Pacific employees. Wallin visits with civic groups and schools, distributing fact sheets and showing videos.

Wallin says the biggest surprise for people in her class is finding out how quickly a train moves.

"You really only have about 20 seconds from the time the gates come down and the lights go on," says Wallin. "People are amazed, that's a pretty short amount of time."

## AUDIO

[Pedestrian-train accidents on the rise](#) (story audio)

## PHOTOS

- [Train crossings](#)
- [Sgt. Shannon Monroe](#)
- [Memorial to a train victim](#)
- [View full slideshow](#) (9 images)

## RESOURCES

- [MnDOT statement on railroad crossing fatalities](#)
- [Operation Lifesaver](#)
- [Burlington Northern Santa Fe railroad crossing safety program](#)

## YOUR VOICE

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Wallin says it's impossible for a locomotive weighing hundreds of tons to stop in 20 seconds. She says as difficult as it sounds, some people don't understand that.

Wallin thinks adding gates at pedestrian crossings will help. She says educating people to be safer and smarter around railroad tracks is the key to avoiding tragedy.

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Published: August 14, 1996

Section: NEWS

Page#: 01B

Grandmother, child escape train accident

By David Chanen; Staff Writer

The train engineer knew why a young couple were jumping up and down and waving their hands just a few yards ahead of the train. A car, which the engineer later learned was occupied by a woman and her grandson, had stalled on the tracks at the next crossing.

Moments after the Tuesday night crash on Minneapolis' **Nicollet Island**, the engineer looked at the mangled car that the train had pushed 50 yards down the track and said, "I was carrying 16,000 pounds of coal and there was no way I could stop."

The woman, 60, and the boy, 2, somehow escaped with only scratches after their car stalled at W. Island Av. and Grove St. at about 9:05 p.m. Police and witnesses said the woman told them that she didn't believe the train was near, even though signal lights were flashing. She apparently then stopped her car on the tracks and it stalled.

After the accident, the couple who tried to flag down the train

ran to a nearby friend's house and told them to call 911. The child, who was strapped in a car seat, had minor injuries. He was taken home by his parents, who live several blocks from the crossing.

Minneapolis police officer David Mattson said the woman was taken to a hospital, but that she also had only minor injuries.

A woman who lives next to the tracks said she was talking on the telephone when she heard the train's whistle "going ballistic." She said people who live near the tracks never hear more than a quick "toot, toot" when trains go by, and she was surprised to hear the whistle "blowing, and blowing and blowing."

After the crash but before paramedics arrived, witnesses said, the woman got out of the car with her grandson and started to walk down the tracks. The engineer, who was shaken and was being comforted by railroad personnel and a police officer, said she was just thankful the car's occupants weren't seriously hurt.

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The train was operated by Burlington Northern-Santa Fe Railroad. A company inspector said it was moving at 15 to 18 mph. Mattson said he was told that the signal lights were working properly.

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**Overview of Comments on DeLaSalle Stadium EAW**  
**Edna C. Brazaitis**



1

After observing the A-Mill EAW process, I am convinced that the EAW process is one of the most important tools that governmental agencies have to make sure that the necessary time is taken to gather important information prior to making an irrevocable decision with detrimental consequences to important public assets. The whole purpose is to help decision makers with their evaluation of the process and to avoid unintended consequences that could have been foreseen with planning.

In this context, my detailed comments are meant to help clarify and to add to the work that has been done by DeLaSalle and the City in preparing the draft, to help insure that inadvertent misunderstandings do not occur that could irrevocably damage this important public asset which substantial public and private effort and funds have gone into saving, preserving and protecting.

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<sup>1</sup> Source: MHS – Sign in front of Grove Street Flats taken by Charles Nelson. 1970's.



2

### **An EIS is Needed – Alternatives Exist with Less Environmental Impact**

Considering the unique situation posed by Nicollet Island, I ask that the City prepare an Environmental Impact Statement (EIS) to further evaluate the stadium and its related projects. An EIS would undertake a careful study to examine alternatives that would have less impact on the fragile nature of this special place.

DeLaSalle has almost tripled its student body since the 1990's which has put pressure on its facilities. An EIS is important because the stadium is only a part of the additional facilities that DeLaSalle wishes to add to its school and alternative sites exist that would both better meet DeLaSalle's needs and have less of an impact on the environment.

It is the statutory public policy of the State of Minnesota to preserve historic districts and to set aside open space as regional parks<sup>3</sup> for the benefit of future generations. I know of

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<sup>2</sup> The area to be impacted showing native plantings and UM urban tree experiment.

<sup>3</sup> "The spirit and direction of the state of Minnesota are founded upon and reflected in its historic past. In the effort to preserve the environmental values of the state, outstanding geographical areas possessing historical, architectural and aesthetic values are of paramount importance in the development of the state; in the face of ever increasing extensions of urban centers, highways, and residential, commercial and industrial developments, areas with an unusual concentration of distinctive historical and architectural values are threatened by destruction or impairment. It is in the public interest to provide a sense of community identity and preserve these historic districts..."MSA 138.71 (1971) See also MSA 473.302 and 138.51(1965)

no public policy of the state of Minnesota that decrees that football stadiums must be located right next to private schools.

In fact, in the case of long established urban schools, finding an appropriate setting for an athletic stadium immediately adjacent to a school is seldom possible. DeLaSalle is not alone in this dilemma. In the Tri-Metro Conference of which DeLaSalle is a member, DeLaSalle, St. Agnes and St. Bernard's do not have football fields; the football fields for Blake and Minnehaha Academy are far from their senior high school; and Saint Paul Academy does not have lights. Many public school facilities, such as North High's field, are a distance from the school.

The two landscape architects on the MPRB's recent Citizen Advisory Committee (CAC), who were the only CAC members with the skills and expertise to independently evaluate the siting of the proposal, concluded that trying to fit the Stadium on Nicollet Island was like trying to "fit a square peg in a round hole". Neither of these distinguished experts had ties to either DeLaSalle or Nicollet Island. Both urged DeLaSalle to consider alternatives that would better meet their needs, including some nearby sites.



**Pedestrian and Bike  
Oriented Park – Would  
Lose Important Bike  
Connector**

This portion of the Central Mississippi Regional Riverfront park on Nicollet Island was designed to be pedestrian and bicycle oriented. This is in line with the Minneapolis Plan<sup>5</sup> that encourages the cyclist movement and pedestrian oriented activities. Parking was to be minimized to tempt visitors to tour the island by foot or by bike. The land that DeLaSalle proposes to pave for a parking lot was slated to be an off-street connector between the Boom Island and Main Street bike paths.

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<sup>4</sup> St. Paul. Photographer: Charles Affleck \_Photograph Collection 1895-1898

<sup>5</sup> See Chapter 8 on Movement.

## Traffic Study is Flawed

6



DeLaSalle's expert in error concluded that the projected number of cars at DeLaSalle's games would significantly be below those he measured at actual games. The conclusions of the expert, including impact on traffic and traffic patterns are based on faulty assumptions and need to be carefully re-examined. This is especially important because of the pedestrian and bicycle orientation of the park. Adding more auto traffic to a streetscape which is not designed for it could lead to accidents and liability for the City.

## Noise Study is Flawed

DeLaSalle's noise study ignores the impact on the closest residential buildings where the noise levels will most likely exceed the state maximum noise standards, as it has at DeLaSalle games played at Benilde. In addition, it does not describe what amplification might be anticipated from noise traveling over water.

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<sup>6</sup> Two men with automobile; one is turning the crank. \_Photographer: Charles P. Gibson  
\_Photograph Collection ca. 1900 \_Location no. HE3.1 p161 \_Negative no. 240-B



### **Safety Issues/City Liability Issues**

The street and other public works improvements made in the 1990's were designed for low volume traffic. Some sidewalks were kept extremely narrow (30"). It was assumed that park visitors would be using the streets as "sidewalks" as they have since the 1860's as shown in the above photo of Island Avenue on Nicollet Island by Rufus Upton in 1865 (MHS). During the 1997 improvements due to low automobile volume expectations, bike paths were not separated and bikes were expected to use the streets.

DeLaSalle participated in the planning for the Island in the 1990's. It had an obligation and a duty to speak up publicly at that time, before the public improvements were made, about any desire that they had for a football stadium which would have demanded a different public works design than that which was implemented. Increasing the traffic without changing the design may expose the city to liability claims.

In addition, not only is the proposed path through the football field an unattractive substitute for the open streetscape, it is also not handicap nor bike friendly. Its design may hold further liability for the city.

### **Dangerous Railroad Main Line Crossing**



Accidents and deaths have happened in the recent past at the Nicollet Island crossing.

In 2004, MPR reported that train pedestrian accidents are on the rise and that guarding is ineffective against preventing pedestrian deaths, as the picture above of a memorial to a teenage fatality on the Burlington Northern tracks in Moorhead shows<sup>7</sup>. Fans at games tend to be distracted and may be at greater risk for injury at the crossing, no matter what safeguards are taken. Intentionally placing a football stadium next to a dangerous crossing may expose the city to liability claims.

### **Inherent Risks – the River, Bridges, Dangerous Currents, the Falls and Caves.**

Unfortunately, falls from the bridges and drowning in the Mississippi are a far too common occurrence. The EAW does not explore these important safety issues and it does not question whether it is wise to stress more night oriented teen oriented activities at which time these inherently dangerous conditions become even more dangerous.

### **A Stadium was Never Planned for the Regional Park.**

The 1983 agreement did not obligate the MPRB to build an athletic stadium on regional park land. In fact, it was specifically represented in 1983 by the MPRB to the Met Council that no regional park land would be used for DeLaSalle's athletic facility. Any obligation between the MPRB and the MCDA about a football field was satisfied in 1984, when DeLaSalle was given permission to encroach on 1/2 acre of city property to build its current regulation size football field.

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<sup>7</sup> [http://news.minnesota.publicradio.org/features/2004/07/19\\_rehab\\_traincrossings/](http://news.minnesota.publicradio.org/features/2004/07/19_rehab_traincrossings/)

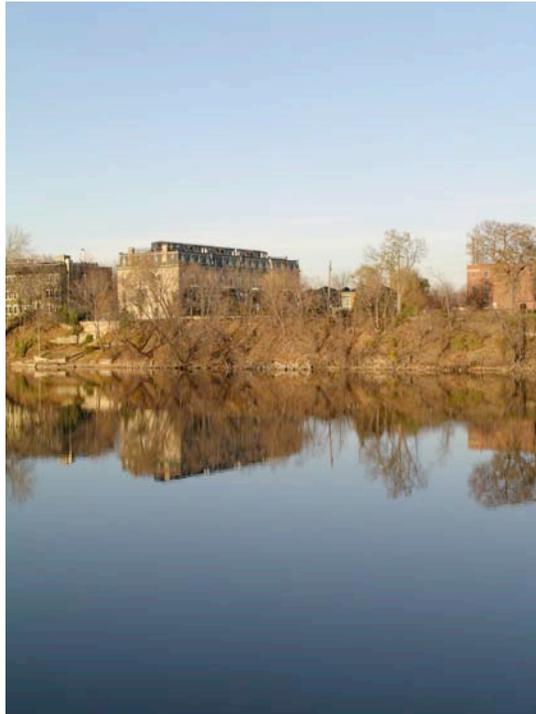
None of the planning documents call for a stadium in this location. In fact, they all emphasize historical and river oriented activities that take advantage of the Island's unique attributes.

### **Keep the Grid**

Grove Street has served the public since it was platted in 1866. The Minneapolis Comprehensive Plan is replete with callings for keeping the grid and restoring the grid as important to a livable city. In addition, given that keeping the historic street pattern is important to the historic district, it would be a major departure from city planning principles to demolish a street that has served the city so faithfully.

### **Alternatives Exist – an EIS is Essential**

In conclusion, before environmental damage is done to this unique property, it is important to perform an EIS that would thoughtfully consider the alternatives to this fragile site. In addition, it would more fully explore the questions that were raised by the expert letters in the Citizen Petition for the EAW that have not been fully addressed.<sup>8</sup>



9

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<sup>8</sup> From comments of City Staff, I understand that the petition and the accompanying documents would be incorporated into this EAW and if not, I hereby request that they be so.

<sup>9</sup> View of the site from the Federal Reserve.

Dear Michael,

I am very much concerned about the proposed inappropriate placement of a football and soccer stadium on Nicollet Island.

The EAW does not take into consideration the negative impact of the increased traffic that this proposed stadium would have, both from the DeLaSalle use AND Park Board rental.

An additional concern is the negative impact on the quiet, natural and historic aspects of Nicollet Island. Sufficient representation to historic preservation is not given in the EAW, including the historic cutstone retaining wall adjacent to the railroad.

The tennis courts are being wiped out by this proposal. What future impact will that have? Is DeLaSalle going to want to take more land to replace them?

The pedestrian use of the island is already great, and growing – walkers, joggers, Segway tours, etc. The island as it is now is a precious, magnificent, quiet, natural and historic refuge in the middle of a bustling major city. This unique quality gives it its highest use as an amenity in our city. It would be negatively impacted by the proposed stadium and the vehicular traffic it would engender.

There is not enough sidewalk at present on East Island Avenue. It is especially dangerous to cross the railroad tracks for me. I use an electric wheelchair and always fear getting my wheels stuck in the wide gaps when crossing the tracks. The safety issues for the sidewalk and railroad tracks should be addressed by the Park Board first.

Sincerely,  
Joyce Vincent  
St. Anthony West Neighborhood resident  
[joycevincent@mn.rr.com](mailto:joycevincent@mn.rr.com)  
H: 612-623-0157  
F: 612-623-7823  
38 7th Avenue NE  
Minneapolis, MN 55413-1804

-----Original Message-----

**From:** Christenson, Steve [mailto:Steve.Christenson@ecolab.com]

**Sent:** Tuesday, December 06, 2005 1:02 PM

**To:** Orange, Michael

**Cc:** Lisa Hondros

**Subject:** De La Salle EAW Comments posted on website

In reviewing comments on the De La Salle EAW posted on the city's website, I noticed a couple items:

1. The copy of Robert Roscoe's letter dated 11-15-2005 is missing its second page (signature page) -- perhaps this is just a computer error, but attached is an electronic copy of both pages 11-15-2005
2. The Met Council comments dated 11-15-2005 mention "no major issues of consistency with Council policies" -- by contrast, Met Council's letter dated April 14, 2005 (copy attached) states "Regional open space money cannot be used to acquire land which would be used for athletic facilities or to construct athletic facilities" and goes on to discuss how this policy applies to the proposed project.

I realize the official comment period is closed, but wanted to be sure you had all of architect Roscoe's comments as well as a more complete picture of the Met Council's policies. Thank you.

Steve Christenson  
612-379-4524

<<Robert Roscoe Letter 11-15-2005.pdf>> <<Met Council letters.pdf>>

April 14, 2005

P. Victor Grambsch, President  
Nicollet Island – East Bank Neighborhood Association  
132 Bank Street SE  
Minneapolis, Minnesota 55414

Re: Potential Nicollet Island Land Use Issues

Dear Mr. Grambsch:

Thank you for your letter of March 18 regarding a proposed football/soccer facility adjacent to DeLaSalle High School which would utilize land acquired with a Metropolitan Council regional park grant. This letter replies to the questions you have raised.

1. If this project goes forward, will Metropolitan Council review be required?

If the proposal does include land acquired with the Metropolitan Council grant, then the Council would review the proposal under its adopted policies to determine whether or not to release the restrictive covenant on the parcel.

2. What would be the process for such a review? Would concerned residents and neighbors have a chance for input?

The Minneapolis Park & Recreation Board would have to submit a proposal to the Metropolitan Council requesting that the restrictive covenant be released. The proposal would be reviewed by Council staff and their recommendations would be considered by the Metropolitan Parks and Open Space Commission. The Commission would provide opportunities for input from interested parties at its meeting and then forward its recommendations to the Metropolitan Council's Community Development Committee. The committee's deliberations on this matter would also include opportunities for input. The committee's recommendation would then be forwarded to the Metropolitan Council for its consideration and action.

3. Under what circumstances would the Metropolitan Council consider waiving the covenant requiring continued regional open space status? Has this been done in other similar circumstances?

The Metropolitan Council has waived the covenant when it approved a land exchange agreement. Enclosed is the applicable Park Policy E-3 and criteria that would be used to consider a land exchange. With regard to land exchanges in other "similar circumstances," the Council has agreed to land exchanges for the following non-regional park uses:

- a. A neighborhood park and maintenance garage in White Bear Township as part of Bald Eagle-Otter Lake Regional Park.
- b. A portion of the Lino Lakes City Hall/Service Center complex as part of Rice Creek Chain of Lakes Park Reserve.
- c. The City of Cottage Grove and Washington County Service Center as part of Cottage Grove Ravine Regional Park.

P. Victor Grambsch

April 14, 2005

Page 2

- d. Four Hennepin County road improvement projects and two State Highway improvement projects that affected six regional parks and a regional trail managed by Three Rivers Park District.
- e. The Council is currently considering a proposal for converting 39 acres of Spring Lake Regional Park in Scott County to a city athletic field complex in exchange for 51 acres to be added to that park and funds to acquire 71 acres for Doyle-Kennefick Regional Park. That proposal was considered by the Metropolitan Parks and Open Space Commission on April 5. The Commission recommended the proposed exchange. The Metropolitan Council's Community Development Committee is scheduled to consider the Commission's recommendations at the committee's April 18 meeting.
4. Our understanding is that in the past, the Metropolitan Council has agreed to conversion of park land to other purposes by swapping the park land for contiguous parcels of land of equal value as regional open space. On Nicollet Island this would not be possible since all land contiguous to Block 4 is already subject to the same restrictive covenant. How could such a swap work in this case?

As noted in Policy E-3, in exceptional circumstances, the Metropolitan Council may accept as equally valuable land the addition of land to another unit of the regional park system where that replacement land has comparable or better natural resource characteristics and comparable or better recreation opportunities than the land being converted and all other provisions of Policy E-3 can be met.

5. It is our understanding that the Park Board would lease the land to De La Salle for a lengthy term (e.g. 99 years). Would such a long-term lease of property acquired with regional open space monies be permitted?

The use of the land for non-regional park purposes would have to be approved by the Metropolitan Council under the conversion Policy E-3 cited above. Assuming the Council approved the land exchange, the Minnesota Department of Finance may have to review and approve a lease since the land, which was acquired in 1986, was purchased with State bonds appropriated in 1983. Please contact Mr. Peter Sausen, Assistant Commissioner, Minnesota Department of Finance at 651-296-8372 to discuss this lease issue.

6. Can you confirm whether the athletic facility as proposed would be a prohibited use of regional open space money?

Regional open space money cannot be used to acquire land which would be used for athletic facilities or to construct athletic facilities. In May 1983, the Metropolitan Council's chief legal counsel reviewed an agreement between the Minneapolis Park & Recreation Board and the then Minneapolis Community Development Agency regarding land on Nicollet Island and had the following opinion:

"Paragraph 1.02 of the agreement requires the [Minneapolis] park board to use its best efforts to construct an outdoor stadium and two tennis courts adjacent to De LaSalle High School and enter into an agreement with De La Salle for their use of the facilities.... At a minimum, no regional [park] funds could be used for this construction because the construction of a football field and tennis courts as a neighborhood recreational facility would not be consistent with regional park uses and would not be considered regional park development"

P. Victor Grambsch  
April 14, 2005  
Page 3

I hope that this letter responds to all your questions about the Metropolitan Council's potential role regarding this issue. Of course, these responses are informational only. The Metropolitan Council's actual response may differ depending on the specific and relevant facts that may exist in the future, and the actual proposal, if any, that may be submitted to the Metropolitan Council for consideration.

Sincerely,



Peter Bell, Chair  
Metropolitan Council

cc: Lynnette Wittsack, Metropolitan Council District 8  
Glen Skovholt, Chair-Metropolitan Parks and Open Space Commission  
Michael Rainville, Metropolitan Parks and Open Space Commission District 7  
Jon Olson, President Minneapolis Park & Recreation Board  
Jon Gurban, Superintendent Minneapolis Park & Recreation Board  
Peter Sausen, Assistant Commissioner, Minnesota Department of Finance

Enclosure: Policy E-3: Conversion of Regional Park System Lands to Other Uses

Excerpt from *Regional Recreation Open Space Policy Plan*, Metropolitan Council, adopted September 5, 2001 and amended December 4, 2002 (publication no. 78-02-047)

### Policy E-3: Conversion of Regional Park System Lands to Other Uses

Lands in the regional park system will only be converted to other uses if approved by the Metropolitan Council through an equally valuable land or facility exchange as defined below.

"Equally valuable land" is defined in this context as land that is contiguous to the regional park system unit containing the land proposed to be exchanged (i.e. only add and take away land in the same park/trail unit). And/or, the land has comparable or better natural resource characteristics and could provide comparable or better recreation opportunities as what is being exchanged. In exceptional circumstances, the Metropolitan Council may accept as equally valuable land the addition of land to another unit of the regional park system where that replacement land has comparable or better natural resource characteristics and comparable or better recreation opportunities than the land being converted and all other provisions of Policy E-3 can be met.

For example, an exchange of land to allow the development of a neighborhood park in a corner of a regional park is consistent with this policy if the land that is being added to the regional park has equal or better natural resource characteristics (e.g. exchange 10 acres of upland hardwood forest for 10 acres of upland hardwood forest). And, the land being added to the regional park can provide comparable or better recreation opportunities (e.g. land being added to the park can maintain or provide a better quality trail system than the land being removed from the park). If the land proposed to be exchanged cannot meet these criteria, then the proposed exchange will harm the regional park system and should not be approved. No land from abandoned railroad rights-of-way can be exchanged if it would preclude future rail use.

"Equally valuable facility" is defined as an exchange of land for facilities when recreational benefits and/or natural resource benefits are increased as a result of the exchange. For example, some land in a regional trail corridor may be exchanged to widen a highway if the highway department constructs a trail overpass or underpass of the widened road at no cost to the regional park implementing agency.

Regional park system lands are protected through restrictive covenants when land is acquired. These covenants ensure that the land is used only for regional park system purposes and cannot be broken or amended unless the Metropolitan Council approves. The only restrictive covenant amendments approved by the Council in which no land was exchanged were for small strips of land needed for public highway improvements. The land was needed to make roads safer and there was no alternative. In addition, the improved highways improved access to the adjacent regional park system unit. The Metropolitan Council will consider land exchanges for other uses if the criteria listed below have been met so as not to harm the regional park system.

The following criteria will be used to determine whether regional park system land may be exchanged for other parkland. For those changes that represent a potential system impact, the Council will use a process comparable to the 90-day review period for plan amendments with a potential impact on the regional system. For conversions such as small exchanges of land to provide right-of-way for access, an expedited review comparable to the 10-day waiver will be used.

Issues with respect to the existing park system unit:

1. How well can the park system unit continue to meet Council site and site attribute standards established for the particular type of park system unit (regional park, park reserve, trail or special recreation feature)?

2. Can the park system unit continue to function as the Council intended? What will happen to the park system unit?
3. Will environmental features (wildlife habitat, water quality) be adversely affected? Can they be protected with the new use?
4. Can any loss of site or function be made up through acquisition of a site with comparable characteristics adjacent to or in the immediate area of the current location? Is there a need for comparable uses in comparable location? Would the system benefit from a different park unit in a different location? Does the park system unit benefit from a facility in exchange for the new use?
5. Will all costs of relocation be covered by nonregional recreation funds?
6. Are there mitigating measures that may be preferable to land exchange, particularly with respect to minor conversions? Is the need for the conversion, as in the instance of transportation improvement, greater than the recreational park system unit?

Issues with respect to the alternative use:

1. What are the land area needs of the proposed project?
2. What are the specific site requirements for the proposed project and how unique are they to the proposed use?
3. What is the duration of the proposed project?
4. Is the proposed project consistent with Council policies?
5. Is the proposed project of greater benefit to the region than continuance of the regional park system unit?

# BRIGGS AND MORGAN

PROFESSIONAL ASSOCIATION

WRITER'S DIRECT DIAL  
(612) 977-8497

WRITER'S E-MAIL  
jperry@briggs.com

## MEMORANDUM

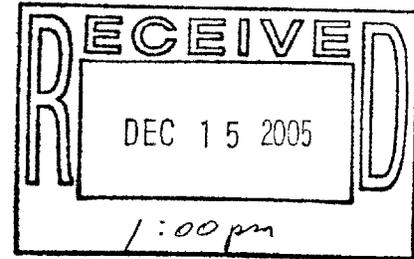
### VIA HAND DELIVERY

TO: Minneapolis City Council

FROM: Friends of the Riverfront

DATE: December 15, 2005

RE: **Environmental review of DeLaSalle's proposed 750-seat football stadium on Nicollet Island**



## ISSUE

With regard to the Minneapolis City Planning Staff's recommended three options for responding to its environmental assessment worksheet (EAW) for DeLaSalle's 750-seat football stadium on Nicollet Island, which option should the Minneapolis City Council follow?

## SHORT ANSWER

The EAW failed to adequately address several environmental issues — *e.g.*, (1) traffic, (2) noise, (3) land use compatibility (property value), (4) historical impacts, and (5) alternatives. And, despite the Staff's suggestion to the contrary, there is no other forum for these inadequately addressed environmental issues to be properly analyzed. Indeed, with Minn. Stat. § 15.99's 60-day rule, the City Council does not have time to conduct such environmental scrutiny in the context of subsequent zoning requests. Plus, such environmental reviews must be conducted before any permit approvals are granted (Minn. R. 4410.3100) because the environmental review is to be a reference document for the subsequent review processes. Thus, with regard to environmental review of this stadium project, it is now or never.

The Staff, together with DeLaSalle, should be asked to further develop the EAW as set forth in Option 3. Option 3, as described by the Staff, provides:

3. Conclude that the EAW is not adequate because more information is needed. The City must then define what additional information is needed to make it complete and postpone its decision on the need for an EIS until that information is available. State rules allow for a 30-day postponement of the decision. The following is an excerpt from the Minnesota

BRIGGS AND MORGAN

Environmental Quality Board's report, "EAW Guidelines: Preparing Environmental Assessment Worksheets" (emphasis added):

The RGU may postpone its decision on the need for an EIS for up to 30 additional calendar days if it determines that **"information necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could be reasonably obtained"** (part 4410.1700, subpart 2a). This provision is intended to provide for a postponement only on the basis of important missing information that bears on the question of potential for significant environmental impacts. **If the missing information is not critical to the EIS need decision in the opinion of the RGU, the decision should not be delayed. The information can be developed later as part of an appropriate permitting process.** In its record of decision, the RGU can describe the information and how it will be obtained and used.

12/7/05 Staff Request for Action at 3 § A(3) (bold in original; underlining added).

Except for the Minneapolis Park & Recreation Board's proposed 2.4-acre public parkland property give away to the private school, DeLaSalle has repeatedly represented to the Park Board that it will build its football stadium without any other subsidy or cost to the Park Board and the City. Assuming that the private school is true to its word, DeLaSalle should then be willing to pay for the Staff's costs, including the costs of outside experts, to finish the required environmental review.

ANALYSIS

I. THE INADEQUACIES OF THE EAW

A. Traffic failings

1. The EAW failed to analyze the level of service (LOS) for any of the Nicollet Island intersections, including without limitation the following:
  - a. West Island Avenue and Grove Street;
  - b. West Island Avenue and Eastman Street;
  - c. Maple Place and West Island Avenue;
  - d. Maple Place and East Island Avenue;
  - e. Maple Place and Nicollet Street;
  - f. Grove Street and Nicollet Street;
  - g. West Island Avenue and Merriam Street;
  - h. East Island Avenue and DeLaSalle Drive; and
  - i. Wilder Street and Merriam Street.
2. The EAW failed to include in the traffic analysis the traffic impacts from the other reasonably anticipated events on Nicollet Island, including those events at:
  - a. Nicollet Island Inn;
  - b. Nicollet Island Pavilion; and
  - c. Other.
3. The EAW failed to conduct a standard computer-generated simulation of the anticipated traffic (*e.g.*, SimTraffic, or CorSim).
4. The EAW failed to conduct related air emissions analysis within Nicollet Island due to the delayed departure.

BRIGGS AND MORGAN

**REQUEST #1:** The City Staff, together with DeLaSalle, should perform the standard computer generated simulated traffic analysis (preferably, SimTraffic) of the affected Nicollet Island roadway intersections, inclusive of all other traffic impacts (including other Nicollet Island events). The City Staff, together with DeLaSalle, should also perform the related air emissions analysis within Nicollet Island due to the delayed departures.

**B. Noise failings**

1. The EAW failed to analyze the noise impacts on the nearest neighbors — *i.e.*, the tenants/lessees at 20 Grove Street, which is just across the street from the proposed football stadium seating. Such omission must be corrected because:
  - a. Maximum noise levels are to be measured at each receptor without exception for tenants or lessees;
  - b. The landlord has not and cannot waive for his tenants/lessees the noise level exceedences to which they will be subject; and
  - c. Chart 24-1 (aerial photo of loudspeaker noise levels) appears to show dBA at 20 Grove Street of between 66-72 dBA, which is above the state's maximum permissible noise levels.
2. The EAW failed to identify any statutory or rule exemption of crowd noise from the state's maximum permissible noise levels. Such omission must be corrected because:
  - a. Absent any such express exemption, neither MPCA nor the City has the right to unilaterally create such an exemption;
  - b. Crowd noise can be measured and predicted;
  - c. Crowd noise will be no less real to the affected residences than loudspeaker noise; and
  - d. The City is bound by the state noise rules.
3. The EAW failed to analyze the noise level impacts of football games that extend after 10:00 p.m., wherein the maximum noise level for the affected residential area drops from L10 65 dBA to L10 55 dBA.
4. The EAW failed to coherently explain how the loudspeaker noise would not exceed the state's maximum permissible noise levels.
  - a. Loudspeaker noise must be materially louder than crowd noise in order to be heard by the crowd over the crowd noise;
  - b. Loudspeaker's assumed noise level is 94 dBA in the seating area (EAW at 22);
    - (1) This is just across the street from 20 Grove Street;

- (2) Only 100 feet from Grove Street flats;
  - (3) Only 150 feet from the closest residence to the north; and
  - (4) Only 300 feet from the condos across river (which are not shielded by any structure).
- c. Stadium structure is not an effective noise mitigation barrier;
- (1) Loudspeakers would presumably be above the highest point of the stadium structure;
  - (2) Without an effective noise barrier, these extremely high noise levels will not otherwise naturally dissipate to below the state's maximum permissible noise levels at the closest receptors;
  - (3) No noise analysis to the contrary.
- d. Loudspeaker volume at the nearest residences would have to be louder than the "estimated maximum crowd noise levels," which already exceed the state's maximum noise level before 10:00 p.m. of L10 65 dBA.
- (1) Grove Street flats — 67 dBA;
  - (2) Closest residence north — 73 dBA; and
  - (3) Condos across river — 76 dBA;
- (a) Plus, no discussion of whether the crowd noise would be amplified over the water.
- e. Loudspeaker will be on for at least six minutes per hour during a high school football game.

<p><b><u>REQUEST #2:</u></b> The City Staff, together with DeLaSalle, should prepare a standard noise impact report, including without limitation a maximum noise level overlay for an aerial photograph of the affected areas, which each and every receptor identified by distance from the noise source and with the maximum noise level from crowd and loudspeaker noise shown in L10 dBA.</p>
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C. Land use compatibility (property valuation)

1. EAW ¶¶ 9 & 27 require an analysis of land use issues, including compatibility, which includes property value impacts.
  - a. *E.g.*, one of the principal issues with the EAW for Xcel Energy's West Lakeland ash landfill is its purported adverse property value impacts.
2. Ex. Q to the EAW Petition provided an expert real estate appraiser's "opinion that there is a potential for significant property value diminution to certain properties on Nicollet Island if the proposed athletic and outdoor facility is constructed."
  - a. Expert opinion was uncontroverted;
  - b. Expert opinion that is uncontroverted and beyond lay testimony is entitled to deference (*SuperAmerica*); and
  - c. Property value impacts are beyond lay testimony.
3. The EAW failed to analyze the land use compatibility — notably, the property value impacts.
  - a. The EAW acknowledged that "[t]his new activity has the potential for conflict with residential uses" (EAW at 8).
    - (1) "The new facility will introduce a new activity to the Island with seating for 750 spectators, lights, and loudspeakers, all of which do not currently exist" (*id.*); and
    - (2) "The design and operation of the Project, especially the impacts of noise and lighting, has the potential to adversely affect the nearby residential uses" (*id.* at 33).
  - b. But the EAW provided the following three weak excuses for not addressing "the potential for conflict":
    - (1) "Athletic fields and high schools in Minneapolis are located near residential fuses and are allowed as conditional uses in the residential zoning districts" (*id.* at 8);
    - (2) Under the City's CUP process, "the City and the neighbors [will have] the opportunity to encourage and enforce siting and design that could minimize those impacts" (*id.*); and

BRIGGS AND MORGAN

- (3) Enumerates various "plans" that need to be complied with.
- c. But the EAW conspicuously fails to provide an alternative forum and time for such compatibility analysis, including property valuation, to be performed.
4. The EAW failed to acknowledge several land use and plan restrictions for the proposed football stadium. For example,
  - a. Metropolitan Council's counsel opined in May 1983 that "the construction of a football field and tennis courts as a neighborhood recreational facility would not be consistent with regional park uses and would not be considered regional park development" (EAW Petition, Ex. E at 6) (emphasis added);
  - b. Metropolitan Council's September 2, 1992 Agreement and Restrictive Covenant with the City, which can "be enforced by . . . any citizen residing within the metropolitan area," prohibits the parkland from being "used for any purpose except regional recreational open space" (EAW Petition, Ex. J) (emphasis added);
  - c. Conversion of subject parkland from "recreational open space" to football stadium can only be done pursuant to approval under Policy E-3: "Conversion of Regional Park System Lands to Other Uses," which cannot be met unless:
    - (1) "Lands in the regional park system will only be converted to other uses if approved by the Metropolitan Council through [a] an equally valuable land or [b] facility exchange as defined below" (EAW Petition, Ex. E) (brackets added); and
    - (2) Neither requirement is met;
  - d. The 1996 Master Plan includes no allowance for a football stadium anywhere on Nicollet Island, let alone across the eastern one-half of the historic Grove Street.

- (1) This plan is the most recent plan for the area;
  - (2) The plan was prepared over several months with the participation and cooperation of all affected island landowners, including DeLaSalle who hosted most of the planning committee meetings.
- e. The EAW omits that the 1983 Agreement grant to DeLaSalle of the right to construct "a full (regulation) size football field" was satisfied in 1984, as is demonstrably proven by the public record.
- (1) On May 25, 1984, DeLaSalle sought and received an "encroachment permit" on to public parkland for its construction of a full "regulation size" football field (EAW Petition, Ex. H); and
  - (2) The encroachment was for a 24-foot wide by 460-foot (or 11,040 square foot) area of parkland between the entire eastern half of Grove Street and DeLaSalle.
- f. The EAW omits that the 1983 Agreement bars the elimination of Nicollet Island roadways, including the eastern one-half of the historic Grove Street.
- (1) Article 3 of the 1983 Agreement obligated Park Board to "maintain all such roads and roadways as part of the Public Parking System"; and
  - (2) Any encroachment on the eastern half of Grove Street and Block 4 would violate the agreement.
5. As the prime landowner of the affected properties on Nicollet Island, the City has a unique interest in the EAW thoroughly addressing this issue.

<p><b>REQUEST #3:</b> The City Staff, together with DeLaSalle, should address the missing land use compatibility issues and procure a qualified expert real estate appraiser opinion to analyze the adverse property value impacts, if any, on the area and the nearby residences due to DeLaSalle's proposed football stadium.</p>
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D. Historical aspects

1. Since 1983, Minneapolis, through its Park Board, has spent millions of dollars in developing and preserving the historic character and feel of the area of Nicollet Island.
2. The EAW failed to analyze the impact on the historic "character" or "feel" of the area.
  - a. But the residences of the Park Board-owned property have page of covenants which are designed to protect this "character"; and
  - b. The 1996 Master Plan discusses at length the historic character and feel of the area, and it identifies ways to preserve this historic character and feel (EAW Petition, Ex. F).
3. More specifically, the City Staff made irreconcilable conclusions.
  - a. "The proposed new construction does not appear to have an impact on the following historic resources in the area . . ." (EAW ¶ 31(2))
  - b. "The design and operation of the Project, especially the impact of noise and lighting, has the potential to adversely affect the nearby residential uses" (EAW ¶ 31(1)); and
  - c. "Residential uses" are no more sensitive to such impacts than the "historic resources," thus the "historic measures" are also subject to the impact of "noise and lighting."
4. Historical impacts are critical to land use compatibility review (*see* above).
  - a. Because historical area on Nicollet Island (*e.g.*, streets, park, etc.) are outside, the aesthetic, noise and light impacts are of greater concern than if the historic area was building
5. No later forum for this study

**REQUEST #4:**

The City Staff, together with DeLaSalle, should prepare an analysis of the impact of the proposed 750-seat football stadium on the historic "character" and "feel" of the area, and then submit this analysis to SHPO and HPC for their input before the City Council decides whether an EIS is needed.

E. Alternatives

1. MEPA environmental review is the only forum for a thorough analysis of alternatives.
2. The EAW failed to require DeLaSalle to do anything besides identify five alternative sites.
3. The EAW failed to require DeLaSalle to address the “no-build” alternative, which is a standard environmental review requirement.
  - a. Because the proposed football stadium is on public land, the City should take this opportunity to review the wisdom of such use of public parkland.
4. The EAW misstated that the Park Board-appointed Citizens Advisory Committee (CAC) addressed the issue of alternative sites.
  - a. In fact, EAW Ex. G at 4 provides to the contrary: **“this CAC is not the appropriate body for considering alternative sites”** (bold in original).
  - b. In the CAC meetings, DeLaSalle’s representative stated that “[t]he City of Minneapolis may . . . conclude that we’re required to consider alternative sites, and if they do, we will.”
5. Because of the proposed 2.4-acre public subsidy to the private school, the EAW discussion of alternatives must be from the perspective of both the City and DeLaSalle.
  - a. The only identified public benefit for the proposed football stadium is 480 hours per year of public instruction on the field (EAW Staff Request at 19 ¶ d).
  - b. At the November 2, 2005 Commissioner Dzierdzic declared the public purpose of the deal was as follows:

“There is a public purpose and the public purpose is that youngsters are gonna benefit. Whether it be in the classroom with math, reading, writing or arithmetic or on the athletic field with the obesity problem that we have today whether it's gonna be playing football or soccer or just a regular gym class the kids are gonna benefit. The education that the Christian Brothers or not too many Christian Brothers left anymore, or the teachers give the

**BRIGGS AND MORGAN**

650 students at DeLaSalle most college bound, 40% minority, it's a great education. I think that's the public purpose."

**REQUEST #5:**

The City Staff, together with DeLaSalle, should analyze in detail each of the proposed alternative sites, including without limitation (a) site availability; (b) site distance from DeLaSalle; (c) site distance from DeLaSalle's student body's residences; (d) zoning for a football stadium; (e) compatibility with surrounding properties; (f) need for a public parkland give away; (g) site acquisition/least cost; (h) site development cost . . .

## CONCLUSION

The proposed football stadium, if approved, will be a permanent fixture of the Island for decades to come. Whether one is for or against the proposal, the City as the RGU should ensure that its impacts are clearly understood and mitigated before it is too late. A thorough and complete EAW is the best way to accomplish this goal. The above-stated five requests help ensure thoroughness and completeness.

JYP/kg

1853432v3

**Orange, Michael**

**From:** Schiff, Gary  
**Sent:** Thursday, December 22, 2005 12:09 PM  
**To:** Orange, Michael  
**Subject:** FW: DeLaSalle EAW

For the record

-----Original Message-----

**From:** Judith Martin [mailto:jmartin@umn.edu]  
**Sent:** Wednesday, December 21, 2005 5:13 PM  
**To:** Lane, Barret W.S.; Niziolek, Daniel J; Zimmermann, Dean G; Schiff, Gary; Goodman, Lisa R; Johnson Lee, Natalie; Ost Paul T; Zerby, Paul G; Colvin Roy, Sandra K; Benson, Scott A; Lilligren, Robert W  
**Subject:** DeLaSalle EAW

Dear Council Members,

As most of you know well, I have served on the City Planning Commission for many years, and for all of that time and more I've been a tax-paying resident of Nicollet Island - not on park land. In all of my years on the CPC, I've never inserted my self into any planning decision, but the time has come to do so. You are being asked to accept the DLS EAW. I, along with all of my island neighbors, the Twin Cities environmental community, the National Park Service, and others, hope that you find the EAW inadequate as to the facts.

The full environmental impacts of the proposed stadium have not been fully evaluated -- and others have made that point to many of you. I wish to highlight three significant planning concerns:

- 1) the traffic analysis section of the EAW analyzes only the traffic associated with the stadium, ignoring the reality that every fall Friday night game occurs at a time when the Park Pavilion and the Nicollet Island Inn are already hosting events with overflow traffic. This needs to be considered in the traffic count, and it was not;
- 2) the closure of Grove Street makes no sense from a planning perspective -- only three streets cross the island (one is already private, one is south of the tracks and one is north of the tracks). To have Maple Avenue as the only remaining cross-island public street -- on the far side of the RR tracks -- in a regional park is poor planning. Grove Street is one of the very oldest streets in the city, with over 30 households living on it. Never in all my years on the CPC have we approved closing a residential street that has such a level of use;
- 3) issues associated with the Burlington Northern tracks have been underplayed -- this is a major national RR line, with as many as 50 trains daily, many simply parked for chunks of time. It is also the line that the North Star will use when it begins service. To add so many cars and people to such a potentially dangerous location is also poor planning.

Please look at these aspects of the EAW before you vote this Friday. No professional who has analyzed this proposal -- apart from those hired by DLS -- thinks that the stadium fits on this small site, in a regional park and a national historic district. None of

Regards,

Judith Martin

--

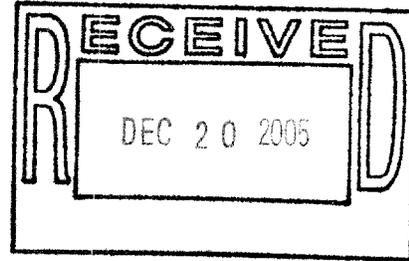
**Judith A. Martin**  
Morse-Alumni Professor & Director    348 Social Sciences,  
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jmartin@umn.edu    Minneapolis, MN. 55455  
Phone: 612-626-1626  
Fax: 612-624-1044

Robert Roscoe/Design for Preservation

1401 East River Parkway, Minneapolis, Minnesota 55414 612.317.0989 broscoc@earthlink.net

December 15, 2005

Nina Archebal  
Director  
Minnesota Historical Society  
345 West Kellogg  
Saint Paul, MN 55102



**R e : DeLaSalle Athletic Facility Development Project, Nicollet Island,  
Minneapolis**

Dear Nina:

As you are aware, DeLaSalle High School is proposing to build a Football Stadium, partially on property owned by the school and part on land owned by the Minneapolis Park Board, including a sizable length of Grove Street, originally platted as a street in 1865. The proposed athletic facility development project on Nicollet Island lies within the St. Anthony Falls Historic District in Minneapolis. This issue has drawn strong opposition from Nicollet Island residents who are in organized opposition to this proposal. In addition, many members of the preservation community who have worked on many Minneapolis preservation issues have become "friends of Nicollet Island," having developed a strong interest in this issue affecting Nicollet Island.

I served on the Minneapolis Heritage Preservation Commission (HPC) for 21 years and worked extensively on many historic preservation aspects of Nicollet Island during those years. Also, my professional work on Nicollet Island included design for renovation of 6 houses, one new infill structure, and one addition.

The Minneapolis Planning Department is preparing an EAW that addresses the issue by setting up components of Nicollet Island to be analyzed as discrete parts, not in the totality in which its historic importance lies. For instance, the EAW text implies that closing East Grove Street has no impact on the physicality of the houses or the historic district. The real issue is how its removal affects the historic integrity of the whole island. The EAW should consider the historical impacts of the proposed development within an embrace of the larger picture, which the developer avoids doing for its own purpose.

A key attribute of a designated historic property is its uniqueness. This attribute has been used over and over to describe Nicollet Island. Nicollet Island is the only inhabited part of Minneapolis completely surrounded by water. Sitting astride the Mississippi River at the head of Saint Anthony Falls, as if being a witness to the entire span of the city's history. The island itself functioned as a sort of fulcrum to leverage city growth from Saint Anthony across the river to land that became an upper Midwest prairie metropolis. Perhaps Nicollet Island's most unique characteristic is its enduring strength in a seeming self-preservation of its natural features amidst the dramatic alteration of the built environment on the island itself and the riverfront around it.

That strength has been guided by the hand of civic interest and dedication, which the City should apply today. In this case, the proposed athletic field is incompatible with the landscape and structures on the island, especially the closing of East Grove Street, the large obtrusive retaining wall, the distorted rise of topography, and the highly visible lighting fixtures that will greatly disturb the quiet character of the river environment. The proposed development is simply too big for this small island location. To evaluate alternatives that would mitigate these significant environmental impacts, the City should require preparation of an Environmental Impact Statement (EIS).

I would appreciate hearing your comments on this issue and especially any advice you can give us on this issue.

Thank you for your consideration of these comments.

Sincerely,

Robert Roscoe

**From:** Michael Cronin [mcronin@mm.com]  
**Sent:** Wednesday, December 07, 2005 10:20 AM  
**To:** Orange, Michael  
**Subject:** Fwd: Reformated EAW comments  
Michael -

The response to Edna's most recent comment.

Mike

Begin forwarded message:

**From:** "Mike Spack" <[mspack@trafficdatainc.com](mailto:mspack@trafficdatainc.com)>  
**Date:** December 7, 2005 9:44:57 AM CST  
**To:** "Michael Cronin" <[mcronin@mm.com](mailto:mcronin@mm.com)>  
**Subject:** RE: Reformated EAW comments

I have a message into you, but here is the crux of my response:

- Approximately 55% to 75% of the football traffic arrives during the 60 minutes around the game. The totals in the tables Edna references are the total vehicles arriving over more than 60 minutes (we may have missed a few who arrived significantly late/early and left significantly late/early). The 55% to 75% is a subset of those totals. Multiplying the totals by 1 / 55% is wrong. They are already accounted for (she is double counting by using these factors).
- The three athletic fields have seating for 1100 to 1300 people. De La Salle will have 750. That will limit the people (and cars) that can show up for a game.
- The De La Salle game had 235 cars arrive and 285 leave (cars arrived before and after we counted the people arriving, but we captured nearly everyone leaving). This is about a capacity game at the new athletic field. A reduction in cars is anticipated at a De La Salle field vs. a home game where they have to travel. There is a greater opportunity for the kids to stay on Nicollet Island which will promote more carpooling.
- Benilde has approximately 900 students. The Breck and Blake schools are big rivals and they are geographically very close to each other. They have about 900 students combined. They have much larger crowds than a typical De La Salle game (De has about 650 students).
- City of Minneapolis staff told us to assume 3.0 people per car when

presented with the data and other resources. This results in 250 cars at a capacity 750 person crowd. Not every game is going to be a "sell out." For most games, there will be less than 250 cars.

- The traffic impact of a football game will be significantly less than the traffic impact of De La Salle's current basketball games, which Minneapolis staff says do not present a traffic problem. Plus we are proposing to add parking.

A very quick bullet point list for discussion. Call me or email me to refine the list. Do you want me to put together a memo?

**Mike Spack, PE**

**Traffic Data Inc (TDI)**  
3268 Xenwood Ave S

St. Louis Park, MN 55416

phone 952.926.0916

fax 1.866.651.5058

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**From:** Michael Cronin [<mailto:mcronin@mm.com>]  
**Sent:** Wednesday, December 07, 2005 9:04 AM  
**To:** Mike Spack  
**Subject:** Fwd: Reformated EAW comments

Mike -

Please see paragraphs 3, 4 and 5.

Thanks,

Mike

Begin forwarded message:

## **EXHIBIT E**

### **Public Comment Meeting**

On 11/15/05, the City of Minneapolis held a Public Comment Meeting regarding the Environmental Assessment Worksheet (EAW) prepared for the DeLaSalle Athletic Facility Project (Project). The meeting's convener, Michael Orange, a Minneapolis City Planner, made an audio tape recording of the meeting. This recording is the official record of this meeting (available for listening during normal business hours in Room 210 City Hall). The following is a synopsis of the comments made at the meeting (apologies if the spelling of names is inaccurate (refer also to the attached sign-in sheet) and if this report does not fully summarize the comments to the satisfaction of the commentators):

- **Simon, Katie:** Spoke about noise issues (including aircraft noise) and livability concerns. The Project does not stand up to the 1983 master plan for Nicollet Island. The Project will have effects on water. There are 60 trains per day now and this will increase with the development of the Northstar LRT which will use these same tracks. The EAW should have an assessment of the base level of noise and also a noise mitigation plan.
- **Carlson, Mark:** Concerns about traffic. Already traffic and parking problems with DeLaSalle basketball games. Concerned about the Project's impact on Grove Street Flats when people will access the stadium bleachers. The EAW had nothing about the truck building (i.e. the former Hertz building now used for residential) yet it is closer to the Project and the sound will have a greater impact here. The EAW did not address current traffic patterns and the effects of the additional traffic. No dust standards were included. The summary of the historic impacts were understated. To be consistent with the historic guidelines for the historic district, new construction should be similar in scale, construction materials, and alignment, therefore the Project is inconsistent.
- **Roscoe, Robert:** The EAW includes lots of details but overlooks the big picture—the uniqueness of the Island. It is fragile and the Project threatens this fragility. The magic is the land itself.
- **Stellar, Chris:** The land use description in the EAW is inadequate. There's no thorough description of the parkland (i.e. the Regional Park status), what goes on there, and who uses it. The EAW has a brief description the railroad's impact on the Project, but listed the wrong name for the railroad and ignored the Project's impact on the railroad. To the question in the EAW "Other unique resources," the response is "No." This is totally wrong. The EAW does not take into account the uniqueness of the Island. It is a special place.
- **Hively, Jan:** She served on the Riverside Advisory Board years ago that dealt with Island concerns. Has 5 concerns:
  - The EAW does not address the Park Board use of the facility, only DeLaSalle's. The Park Board will likely maximize its use of the facility. DeLaSalle and the Park Board (Minneapolis Park and Recreation Board) implemented the 1983 master plan.
  - The 1983 plan cannot be used to rationalize the proposed facility because the provisions of the plan have already been met. DeLaSalle built the current football field and the Park Board built the tennis courts. The EAW ignores the fate of the

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

tennis courts. Students need individual sports they can practice for a lifetime like tennis as well as team sports like football and soccer.

- The EAW does not provide the needed information and analysis regarding the current and proposed stone retaining walls. The current wall is cut stone which has historic value yet the plan is to eliminate it and the EAW ignores this.
- The EAW does not adequately address the visual impacts of the bleachers from Grove St. looking at them from both the east and the west. Grove St. is often crowded now and the vacation will worsen matters.
- There is an important pedestrian route (plus stroller, children, Segway riders, bikers, runners, and horse-drawn carriages) from Boom Island and the Main Street Bridge to the Island. There are no sidewalks on East Island Ave. so the additional traffic from the Project is a big safety concern.
- **Stephanie (last name undecipherable):** The EAW is wrong on p. 9 Question 11 (Fish, Wildlife, and Ecologically Sensitive Resources) saying there are no ecologically sensitive species on the site. The varied wildlife on the Island has had a tremendous influence on her son. He knows every inch of the Island and collects and observes crickets, spiders, snakes and their movements every day. He has a passion for it and it is remarkable resource so close to downtown. It's a fragile place and it's a special role for inner city kids to preserve it.
- **Chaffee, John:** Made the following points:
  - The EAW does not adequately interpret the applicable plans in full context. For example, references to recreation can include both structured activities like football and unstructured like collecting beetles. The document inadequately addresses the Metropolitan Council policies as regards athletic fields in regional parks.
  - The EAW on p. 22 does not fully address scenic views. It ignores views to/from the east even though the proposed grandstand will be taller than the existing high rises on the east bank of the river.
  - The bleachers will have an adverse impact on the Grove Street Flats. Views of the building will include the grandstands in the background.
- **Hoch, Susan:** The traffic analysis does not deal with the change from current conditions which require many trips off-site for sporting events, thus the new stadium will decrease traffic.
- **Viken, Christine:** The gaps in the EAW where "not available" appears is unacceptable. The Project may require a permit from the US Army Corps of Engineers. The noise impacts on the buildings closest to the facility are not adequately addressed. The dimensions used for the noise analysis do not agree with those used for the historic study completed for the Grove Street Flats. The sources in the bibliography are missing. The EAW should have considered the 1974 Historic Preservation Study. By Foster Dunwiddie. The EAW frames the issue as Island residents versus DeLaSalle High School. It ignores the other public stakeholders such as the users of the Island as a regional park function, and the public interest in the historic homes on the Island. Local residents were not adequately notified about the EAW.
- **Link, Brian:** On p. 25, the EAW states that the Project "does not appear to have an impact on the Nicollet Island Residential Area." This doesn't address the size of the Island; it's the smallest neighborhood in the city and the Project could overwhelm it. There is no grid of streets to accommodate the traffic and provide easy access. The impact will be enclosed in

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

this small area. The traffic analysis included DeLaSalle buses but not those of the Park Board. It's an attractive location so there will be many recreational users for the field, noise, lights, etc., and probably time extensions. Page 9 glosses over wildlife impact. Last year saw creatures never saw before: deer, red fox, possum, beaver, ground hogs, and many birds. The Audubon Society stated that the Island to the Gray Cloud Island area is an important birding area. Saw flock of Blue Birds on tennis courts migrating south.

- **Rosenberg, Steve:** Should be evaluated on basis of the larger neighborhood that uses the Island on regular basis including the downtown crowd that goes to lunch on the Island and the new housing going up on the east and west banks. These people have the right to enjoy the Island resources since it is a regional park per the Critical Area Plan and the Nicollet Island Master Plan. At #6b on p. 3, the EAW doesn't quantify the other games and the Park Board uses; therefore it misses the cumulative impacts. There will be activities every night, not just during football games. It is noisy right now at the closest residences,
- **Christenson, Steve:** The EAW ignores 1) the future of the tennis courts, 2) the retaining wall, 3) the cumulative impacts related to Park Board activities, and 4) the uniqueness of the Island. The environmental review needs to consider alternative sites, e.g. Boom Island or the B.F. Nelson site; therefore, an Environmental Impact Statement (EIS) is needed because an EIS includes an alternative analysis.
- **Brazaitis, Edna:** The standard approach to an EAW doesn't work here. For example, the EAW doesn't account for the peaceful rural-like atmosphere in the traffic analysis. When she served on the e1996 master plan effort, they considered separate paths for bikes, pedestrians, and vehicles but agreed that it didn't fit the historic character and felt the traffic would not be extreme even though the park is visited by  $\frac{3}{4}$  million people. They want a quiet place.
- **Scully, Pat:** Made the following points:
  - The narrowness of the EAW is like a zoo that does not allow certain animals. There was a loss of natural areas for the construction of the tennis courts and this will mean an even greater loss. Can't compare the grass of a football field, which is a monoculture, to the biological diversity of a meadow, especially if the field is to have artificial turf. Grass can't handle both soccer and football.
  - Park Board properties are a lousy entrance to the Island. The Pavilion parking lots are ugly, they do not contribute to the Island's aesthetic, and they do not attract people. The Project will also be deterrence to the attractiveness of the Island and therefore will result in fewer visitors.
- **Blasseg, Judy:** Made the following points:
  - Served on the Citizens Advisory Committee for the master plan. They looked at the other regional parks and noticed that that the Island is different. Most regional parks have places for picnics but there are none on the Island. There is no good natural area. If you bring kids, there are no play grounds. Instead, the Island is a neighborhood for a few people; a private enclave.
  - If parking is the issue, the residences have private garages and spaces and there are 4-hour restrictions on some of the streets. If noise is the issue, the trains are much louder than sports events. Her son plays tennis at DeLaSalle and kids can practice on the courts. As to the concern that this is a pedestrian route, you can't have it both ways. There will be traffic at night because it's a regional park and there will be games at night but few people with strollers at night. Visitors aren't welcomed

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

by the residents. There is lots of noise where she lives in the city yet lots of wildlife including deer in the front yard. Her neighborhood is a highly used and visitor-friendly area.

- The field will not be AstroTurf.
- Not all of the homes are historic.
- 600 kids go to this school including hers.
- **Carlson, Nick:** The dates on pp. 24 & 26 of the EAW as regards DeLaSalle should be 1899 not 1866. The Island is a fragile place. DeLaSalle is a part of the Island's environment too. He summarized the school's mission and that it needs to attract students from all over the city.
- **Fried, Arlene:** This is a shoehorn project. She agrees with the many of the statements of others who oppose the stadium.
- **Hanna, Susan:** Lives in Northeast. The EAW does not include enough information regarding the Mississippi National River Recreation Area plan. Children are getting fat and they need places for outdoor recreation. Football is an American icon. It brings people together on Friday night. Lights will not be a problem.
- **Rosen, Tom:** Parking and traffic will be a problem. During an event there are an enormous number of cars and traffic on the streets and this will impact the fire routes and response time.
- **Galatz, Eric:** Summarized the applicable rules for the EAW and the public meeting.
- **Viken, Christine:** State the EAW should include the specific standards from the Advisory Council for Historic Preservation as regards the determination of adverse effect. The EAW does not reference these standards where it includes the conclusion that the Project will have no adverse effect.
- **Brazaitis, Edna:** The railroad crossings will need gate arms.

**Attachments:**

Meeting Agenda

Sign in sheets

**CITY OF MINNEAPOLIS**  
**Public Comment Meeting**  
**Regarding the**  
**Draft Environmental Assessment Worksheet (EAW)**  
**Completed for the DeLaSalle Athletic Facility Project**

**November 15, 2005 DeLaSalle High School**

**Convener: Michael Orange**  
**Minneapolis City Planner**

**All attendees: Please sign in at the tables located in the hallway**

**Speakers: If you wish to make a public comment, please check the box on the right side of the list**

**PUBLIC COMMENT MEETING AGENDA**

- 7:00 **Welcome and description of the purpose of the meeting and the process to be followed.** This is the official Public Comment Meeting held by the City of Minneapolis in its role as the Responsible Government Unit (RGU) consistent with Minnesota Rules Chapter 4410 - 4410.7900 for the above-named EAW. It is not a Public Hearing as defined by City of Minneapolis ordinance. Its purpose is to accept testimony as to the accuracy and completeness of the environmental review documents and testimony regarding potential environmental impacts.
- 7:05 **Brief summary of the environmental review process and the EAW.**
- 7:15 **Public comments.** The Convener will call for speakers in the order they have signed up. In order to enable the opportunity for all that desire to speak, the Convener may set a time limit based on the number of speaking requests.

**Please address the accuracy and completeness of the EAW and potential environmental impacts.**

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**Written comments:** Written comments should be given to the EAW Contact person at the meeting or at any time prior to the end of the public comment period which is 4:30 p.m. on 11/23/05. Comments submitted electronically (email or disc) are preferred.

**EAW contact person:** J. Michael Orange, Principal Planner, 612-673-2347; TDD: 673-2157; facsimile: 673-2728; Minneapolis Department of Community Planning and Economic Development—Planning Division, Room 210 City Hall, 350 S. Fifth St., Mpls., MN 55415-1385. E-mail: michael.orange@ci.minneapolis.mn.us.

11/15/05

SIGN IN SHEET

De La Salle EAW Comment Meeting

Name (Please print)	Address	City	Zip	Phone	Representing	SPEAKING?
Patrick Sully	167 Nicolet	Mpls	55407			X ✓
Gilene Frazee	1109 Xen Xco S		55405			X ✓
Judy Blaseg	4236 Linden Hills Blvd					X ✓
Lawrence R. Romanko	5254 Humboldt Ave.	Mpls.	55430			
Michael O'Keefe	De La Salle High School One De La Salle Drive	Mpls	55401			
Niki Carlson	4035 Sheridan Ave S			Mpls		✓
Susan Hanna	2015 19th Av	Mpls	55418	612-789-7648		
Brian Johnson	5244 NEBOSTAVE S.	MPLS	55418	612-929-5576		NO
Joe Keenan	6A Grove St.	Mpls	55401	612-627-9525		
NAN CARLSON	6B GROVE ST	MPLS	55401	612.331.2841		
Mark Carlsson	6B GROVE ST	MPLS	55401	612.331.2841		X ✓
Caroline Lebedoff	177 Nicolet st	MPLS	55401	612 875 8887		
ERZO LUTMEK	8 A GROVE ST	MPLS	55401	612 929 2312		
Duchy Rucka-cham	163 Nicolet St Dorp	Dorp	55401	612 379 3384		
Chris Steller	95 W Island Ave	Mpls	55401	612 623 9008		X ✓
John Chaffee	163 Nicolet St	Mpls	55401			X ✓
SUSAN HECHT	2210 24th Aves	Mpls	55406	612 722 5861	myself	X ✓
Judith May	10A Grove St	"	55401	612-379-8135		
ERIC GRATZ	150 S FIFTH S.	"	55402	335 1805		
Steven Rosenbly	107 W 15th Ave	MPLS	55409	612.623.8120		✓
MICHAEL RAINVILLE	89 7th Ave. NE	MPLS	55413	767-8074		✓
Sally and	124 Elm Street	Mpls	55401	612 379-4162		



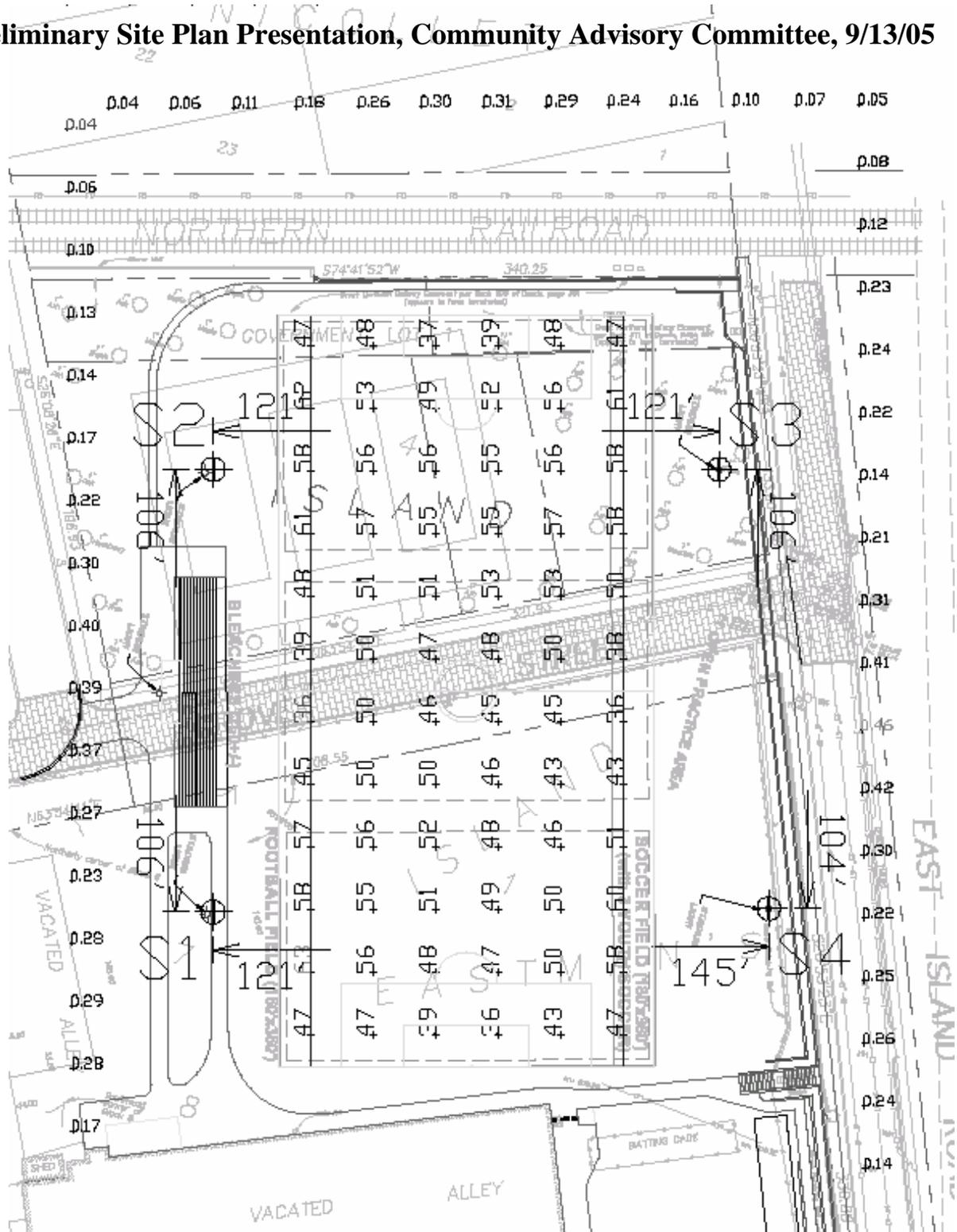
**EXHIBIT F**

**Photos of the Retaining Walls and Lighting Plan**



EXHIBIT G

Preliminary Site Plan Presentation, Community Advisory Committee, 9/13/05



## **ALTERNATIVE SITES**

At the request of the CAC, DeLaSalle considered the following alternative sites off of Nicollet Island and away from the DeLaSalle campus:

- The B.F. Nelson Site. (new development on cleared but polluted land)
- Van Cleve Park (addition to existing facilities)
- Parade Stadium (addition to existing facilities)
- Bryn Mawr (addition to existing facilities)
- Fort Snelling (addition to existing facilities)

## General Comments

**The following comments apply to all five suggested remote sites. Because B.F. Nelson is within walking distance, we address it separately.**

**None of the five sites serve the fundamental requirement of being on or adjacent to the existing DeLaSalle campus.** DeLaSalle is proposing to construct an athletic facility as an addition to its existing campus. DeLaSalle High School proposes to add the athletic facility to its existing campus on Nicollet Island in order to integrate the athletic and academic programs, and provide shared use by the Park Board of DeLaSalle land and facilities on Nicollet Island.

**With the possible exception of Fort Snelling, none of the five alternative sites have adequate existing infrastructure to compensate for the remote location.** The five alternative sites are not designed for spectator sports and therefore do not have adequate parking, or space for parking, on or near the sites. If the facility is located at DeLaSalle, DeLaSalle and the Park Board will be able to use existing DeLaSalle parking, and overflow parking at the Nicollet Island Inn if necessary.

**The CAC is not the appropriate body for considering alternative sites.** Park and Recreation Code of Ordinances, PB11-1 provides that a Citizens Advisory Committee “shall be balanced and representative of the interests impacted by the proposed park facility construction or redevelopment.” The DeLaSalle Athletic Field Citizens Advisory Committee (DLS CAC) is, appropriately, made up of persons representative of the interests impacted by a field on Nicollet Island. The DLS CAC may appropriately determine that the proposal is not appropriate for Nicollet Island. It cannot determine if it is appropriate for another location.

**NO SITE OFF OF NICOLLET ISLAND CAN SATISFY THE FUNDAMENTAL REQUIREMENT OF ADJACENCY TO DE LA SALLE HIGH SCHOOL.** The only “project” under consideration by the DLS CAC is a regulation size football field with related support facilities, including a grandstand for 750 spectators, on parkland adjacent to the DeLaSalle property. This is not a stand-alone project that can be moved somewhere else. The only question properly before the DLS CAC is whether they recommend approval of the proposal to build the athletic facility on the DeLaSalle campus and adjacent park land.

## B.F. Nelson Site

Of the alternative sites the CAC identified, the B.F. Nelson site comes closest to meeting DeLaSalle's requirement for a facility adjacent to its existing campus and the Park Board's charge to "consider options that may include moving of facilities to adjacent parkland."

Although the 12 acre B.F. Nelson site is not adjacent to the DeLaSalle property, a converted railroad bridge provides a pedestrian connection between the north end of Nicollet Island and the southwest corner of the B.F. Nelson site and adjacent Boom Island Park. Weather permitting, students could walk to the B.F. Nelson site from DeLaSalle over that bridge.

The B.F. Nelson site nevertheless has the following substantial disadvantages:

- The B.F. Nelson site is not close enough to the DeLaSalle campus to allow DeLaSalle integrate the athletic facility in school-day activities.
- The B.F. Nelson site is not close enough to the DeLaSalle campus to allow the Park Board to integrate Park Board programs with DeLaSalle programs.
- The B.F. Nelson site is not close enough to the DeLaSalle campus to allow the DeLaSalle or the Park Board to use existing DeLaSalle facilities for the new facility, including parking.
- The athletic field is not consistent with Park Board plans for the B.F. Nelson site. According to the Park Board website, the Park Board adopted a Master Plan for park development in 1993, which plan was reaffirmed through an additional public input process in 1998-99. These plans call for development of the site largely as a passive greenspace, with restoration of prairie, wetland, and riparian slope areas, trails, and environmental and historical interpretive features.
- Because the B.F. Nelson site is remote from DeLaSalle and other facilities support facilities will have to be located on-site, including parking for 225 cars (30% of the capacity of the proposed 750 seat grandstand).



**B. F. NELSON PARK SITE: APPROVED MASTER PLAN**

# Alternative Locations

- ◆ Parade Stadium?
- ◆ Boom Island?
- ◆ BF Nelson Site?
- ◆ Minneapolis School sites?
- ◆ Van Cleve, Bryn Mawr, and Other Parks?

## Current Uses:

- ◆ Benilde-St. Margaret (and others)
- ◆ Fort Snelling?

# Alternative Locations

- ◆ The proposed athletic facility is an addition to DeLaSalle's existing campus on Nicollet Island in order to integrate the athletic and academic programs, and provide shared use by the Park Board of DeLaSalle land and facilities on Nicollet Island.
- ◆ None of the alternative sites serve the fundamental requirement of being on or adjacent to the existing DeLaSalle campus.

# Alternative Locations

- ◆ With the possible exception of Fort Snelling, none of the alternative sites have adequate existing infrastructure to compensate for the remote location.
- ◆ The alternative sites are not designed for spectator sports and therefore do not have adequate parking, or space for parking, on or near the sites.
- ◆ If the facility is located at DeLaSalle, DeLaSalle and the Park Board will be able to use existing DeLaSalle parking, and overflow parking at the Nicollet Island Inn if necessary.

# Alternative Locations

- ◆ **This CAC is not the appropriate body for considering alternative sites.**
- ◆ PB11-1: Citizens Advisory Committee “shall be balanced and representative of the interests impacted by the proposed park facility construction or redevelopment.”
- ◆ The DeLaSalle Athletic Field Citizens Advisory Committee represents interests impacted by a field on Nicollet Island.
- ◆ CAC may determine that the proposal is not appropriate for Nicollet Island. It cannot determine if it is appropriate for another location.

# The B.F. Nelson Site

- ◆ 12 acre B.F. Nelson site is not adjacent to the DeLaSalle property.
- ◆ 12 acre site is adequate for new field and support facilities, including parking for 225 cars (no overlapping use because no adjacent user)
- ◆ Converted railroad bridge provides a pedestrian connection between the north end of Nicollet Island and the southwest corner of the B.F. Nelson site and adjacent Boom Island Park.
- ◆ Weather permitting, students could walk to the B.F. Nelson site from DeLaSalle over that bridge.

# The B.F. Nelson Site

- ◆ Not close enough to DeLaSalle to integrate the athletic facility in school-day activities.
- ◆ Not close enough to the DeLaSalle to integrate Park Board programs with DeLaSalle programs.
- ◆ Not close enough to the DeLaSalle to allow the DeLaSalle or the Park Board to use existing facilities for the new facility, including parking.
- ◆ Park Board envisions “passive greenspace, with restoration of prairie, wetland, and riparian slope areas, trails, and environmental and historical interpretive features” for the site.
- ◆ Support facilities will have to be located on-site, including parking for 225 cars (30% of the capacity of the proposed 750 seat grandstand).

# The B.F. Nelson Site



**B. F. NELSON PARK SITE: APPROVED MASTER PLAN**

# Alternative Locations

- ◆ **NO SITE OFF OF NICOLLET ISLAND CAN SATISFY THE FUNDAMENTAL REQUIREMENT OF ADJACENCY TO DE LA SALLE HIGH SCHOOL.**
- ◆ The only “project” for the CAC to review is a regulation size football field with related support facilities, on parkland adjacent to the DeLaSalle property.
- ◆ Not a stand-alone project that can be moved somewhere else.
- ◆ The only question properly before the CAC is whether they recommend approval of the proposal to build the athletic facility on the DeLaSalle campus and adjacent park land.

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

**EXHIBIT H**

**Project Renderings**

**Final Findings of Fact and Record of Decision for the Environmental Assessment Worksheet for the DeLaSalle High School Athletic Facility Project**

**EXHIBIT I**

**Council /Mayor Action and Planning Department Transmittal Letter**

## DECEMBER 23, 2005

**Z&P** - Your Committee, having under consideration the environmental review process for the 1010 Park Avenue Project, a mixed-use redevelopment with 420 housing units and 37,952 square feet of commercial space served by 577 enclosed off-street parking spaces, proposed by Heritage Development within the block bounded by 10<sup>th</sup> St, Park Ave, Grant St and Portland Ave, now recommends that development of an Environmental Impact Statement not be ordered, therefore making a negative declaration, and that the Findings of Fact and Record of Decision document be adopted.

Adopted 12/23/05.

Absent – Samuels, Lilligren.

**Z&P** - Your Committee, having under consideration the environmental review process for the DeLaSalle High School Athletic Field Project, the proposed addition of a regulation size football field at the school campus at One DeLaSalle Drive on Nicollet Island, now recommends that development of an Environmental Impact Statement not be ordered, therefore making a negative declaration, and that the Findings of Fact and Record of Decision document be adopted.

Zerby moved to postpone the report for 30 days for further analysis. Seconded.

Lost upon a voice vote.

The report was adopted 12/23/05. Yeas, 9; Nays, 2 as follows:

Yeas – Niziolek, Benson, Goodman, Hodges, Johnson, Colvin Roy, Zimmermann, Schiff, Ostrow.

Nays – Zerby, Johnson Lee.

Absent – Samuels, Lilligren.



**Request for City Council Committee Action  
From the Department of Community Planning & Economic Development**

Date: December 7, 2005

TO: Council Member Gary Schiff, Chair of the Zoning and Planning  
Committee, Council Members and Mayor Rybak

Prepared by: J. Michael Orange, Principal Planner, 612-673-2347

Approved by: Barbara Sporlein, Director, Planning \_\_\_\_\_

Subject: DeLaSalle Athletic Facility Project: Environmental Assessment Worksheet  
And Draft "Findings of Fact and Record of Decision Document"

**RECOMMENDATION:** Based on the information in the Environmental Assessment Worksheet, the "Findings of Fact and Record of Decision Document," and the related documentation for the DeLaSalle Athletic Facility Project (Project), the City Council should conclude the following:

1. The Environmental Assessment Worksheet, the "Findings of Fact and Record of Decision Document," and related documentation in the public record for the Project were prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minn. Rules, Parts 4410.1000 to 4410.1700 (1993).
2. The Environmental Assessment Worksheet, the "Findings of Fact and Record of Decision Document," and related documentation in the public record for the Project have satisfactorily addressed all of the issues for which existing information could have been reasonably obtained.
3. The Project does not have the potential for significant environmental effects based upon the findings in the "Findings of Fact and Record of Decision Document" and the evaluation of the following four criteria (per Minn. Rules, Parts 4410.1700 Subp. 7):
  - Type, extent, and reversibility of environmental effects.
  - Cumulative effects of related or anticipated future projects.
  - Extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.
  - Extent to which environmental effects can be anticipated and controlled as a result of other environmental studies undertaken by public agencies or the Project proposer, or of environmental reviews previously prepared on similar projects.

**Request for City Council Committee Action  
From the Department of Community Planning & Economic Development**

4. The finding by the City that the EAW is adequate and no EIS is required provides no endorsement, approval, or right to develop the proposal by the City and cannot be relied upon as an indication of such approval. This finding allows the proposer to initiate the City's process for considering the specific discretionary and ministerial permissions necessary for the Project, and for the City in this process, informed by the record of the EAW, to identify and mitigate any potential adverse environmental effects potentially associated with the Project. Consequently, the City does not require the development of an Environmental Impact Statement for the Project.

Consequently, the City does not require the development of an Environmental Impact Statement for the project.

**Previous Directives:** Refer to Attachment 3.

**Financial Impact** (Check those that apply)

- No financial impact - or - Action is within current department budget.  
(If checked, go directly to Background/Supporting Information)
- Action requires an appropriation increase to the Capital Budget
- Action requires an appropriation increase to the Operating Budget
- Action provides increased revenue for appropriation increase
- Action requires use of contingency or reserves
- Other financial impact (Explain):
- Request provided to the Budget Office when provided to the Committee Coordinator

**Community Impact**

Ward: 3  
Neighborhood Notification: Completed (refer to Record of Decision in Exhibits D & E in attached "Findings of Fact and Record of Decision Document")  
City Goals: Consistent with some; inconsistent with others (refer to the attached EAW)  
Comprehensive Plan: Consistent with some of the goals and policies; inconsistent with others (refer to the attached EAW)  
Zoning Code: Consistent with parts of the Code; inconsistent with other parts (refer to the attached EAW)  
Living Wage/Job Linkage: Private development  
Other:

**Background/Supporting Information**

**A. Options before the City Council:**

There are three options before the City Council:

**Request for City Council Committee Action  
From the Department of Community Planning & Economic Development**

1. Agree with the above staff recommendation and conclude that the EAW is adequate and that the development of an Environmental Impact Statement (EIS) for the Project is not necessary. This is called a Negative Declaration.
2. Conclude that the development of an EIS for the Project is necessary, called a Positive Declaration. The City must then approve the scope of the EIS by defining exactly the nature and detail of information needed to complete the EIS. An EIS normally takes nine or more months to complete. Already having an EAW in this case may shorten the process by a couple of months.
3. Conclude that the EAW is not adequate because more information is needed. The City must then define what additional information is needed to make it complete and postpone its decision on the need for an EIS until that information is available. State rules allow for a 30-day postponement of the decision. The following is an excerpt from the Minnesota Environmental Quality Board's report, "EAW Guidelines: Preparing Environmental Assessment Worksheets" (emphasis added):

The RGU may postpone its decision on the need for an EIS for up to 30 additional calendar days if it determines that **“information necessary to a reasoned decision about the potential for, or significance of, one or more possible environmental impacts is lacking, but could be reasonably obtained”** (part 4410.1700, subpart 2a). This provision is intended to provide for a postponement only on the basis of important missing information that bears on the question of potential for significant environmental impacts. **If the missing information is not critical to the EIS need decision in the opinion of the RGU, the decision should not be delayed. The information can be developed later as part of an appropriate permitting process.** In its record of decision, the RGU can describe the information and how it will be obtained and used.

**B. Steps in the Decision-Making Process**

There are several steps the City must take prior to making a decision on the need for an EIS:

- The City must consider the extensive environmental review record for the Project, which includes the EAW and the “Findings of Fact and Record of Decision Document. City staff have completed this analysis and on that basis recommend the City make a Negative Declaration (option 1).
- The City must order an EIS for “projects that have the potential for significant environmental effects” (Minn. Rules, Parts 4410.1700 Subp. 1). “In deciding whether a project has the potential for significant environmental effects the [City] shall compare the impacts that may be reasonably expected to occur from the project with the criteria in this part” (Minn. Rules, Parts 4410.1700 Subp. 6). The

**Request for City Council Committee Action  
From the Department of Community Planning & Economic Development**

following are the four Evaluation Criteria (Minn. Rules, Parts 4410.1700 Subp. 7), all of which were documented in the Findings document:

1. Type, extent, and reversibility of environmental effects.
2. Cumulative effects of related or anticipated future projects.
3. Extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.
4. Extent to which environmental effects can be anticipated and controlled as a result of other environmental studies undertaken by public agencies or the project proposer, or of environmental reviews previously prepared on similar projects.

The third Evaluation Criteria is an important factor in this case. If there is specific mitigation by ongoing public regulatory authority that is reasonably certain to take place and that the City Council reasonably believes will eliminate the potential for what would otherwise be significant environmental effects, then the Council can conclude, depending upon consideration of the other factors in Minnesota Rules 4410.1700 Subpart 7, that there is no potential for significant environmental effects and conclude no EIS is needed (option #1 above). That decision can also rely on the authority of the City to order whatever additional information is needed during the permit review process.

On the other hand, if the City believes that its ongoing public regulatory authority cannot mitigate the potential environmental effects of the Project to the extent needed to conclude that there is no potential for significant environmental effects as defined by Minnesota Rules, Part 4410.1700, or if the City finds that an EIS is the only way to order any missing information it deems necessary to complete the environmental review, then the City should order the development of an EIS (option #2 above).

As stated above, the third option is to delay the EIS need decision and order the preparation of any missing information as part of the EAW.

**Attachments:**

1. City Council action ordering the preparation of an Environmental Assessment Worksheet for the DeLaSalle Athletic Facility Project, adopted 9/2/05.
2. "Findings of Fact and Record of Decision Document" for the Environmental Assessment Worksheet for the DeLaSalle Athletic Facility Project, draft dated 12/7/05.
3. Environmental Assessment Worksheet for the DeLaSalle Athletic Facility Project, dated 10/20/05 (stapled separately).

**Request for City Council Committee Action  
From the Department of Community Planning & Economic Development**

**ATTACHMENT 1**

**City Council action ordering the preparation of an Environmental Assessment  
Worksheet for the DeLaSalle Athletic Facility Project, adopted 9/2/05.**

## SEPTEMBER 2, 2005

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**Z&P** - Your Committee concurs in the recommendation of the Heritage Preservation Commission (HPC) review committee with the following appointments to the HPC, for three year terms, beginning 6/1/05 and expiring 6/1/08:

- a) Linda Messenger (Ward 2) (Council reappointment); and
  - b) Amy Ollendorf (Ward 11) (new Council appointment, replacing Robert Glancy).
- Adopted 9/2/05.

**Z&P** - Your Committee, having under consideration the environmental review process for the proposed DeLaSalle High School athletic facility project located at One DeLaSalle Dr (Nicollet Island), in response to a petition filed by John Cairns, on behalf of Phyllis Kahn, et al, with the Minnesota Environmental Quality Board, now recommends:

- a) Approval of the findings prepared by the Community Planning & Economic Development;
  - b) That the City order an Environmental Assessment Worksheet (EAW) pursuant to Minnesota Rules, Part 4410.4300, Subp. 31, Historical Places;
  - c) Denial of the petition for an EAW for the project pursuant to Minnesota Rules, Part 4410.1100;
- and
- d) Denial of the request for an EAW pursuant to Minnesota Rules, Part 4410.4500 because the petition and the request are moot since the project is within a Mandatory EAW category under Minnesota Rules, Part 4410.4300.

Adopted 9/2/05.

**Z&P** - Your Committee, having under consideration the recommendation of the Minneapolis Arts Commission to approve and adopt the document "Minneapolis Plan for Arts & Culture," and take the necessary actions to further the implementation of plan recommendations and objectives contained therein, now recommends approval of the Plan, with the exception that Objective 4.3 be referred to the City's budget process. Objective 4.3 proposes establishment of a City policy for funding public art, including dedicating two percent of the City's annual net bond and requiring certain private developments to dedicate funds for public art.

Your Committee further recommends that the proper City officers be directed to immediately implement Objective 2.1.1 which establishes an Arts and Culture Coordinating Committee. Staffing of this committee will be the responsibility of the Department of Community Planning & Economic Development/Planning Division-Cultural Affairs.

Adopted 9/2/05.

**Z&P** - Your Committee concurs in the recommendation of the Planning Commission in granting the application of Augsburg College to vacate a) a portion of 8<sup>th</sup> St S lying westerly of the west line of 25<sup>th</sup> Ave S and easterly of the west line of 24<sup>th</sup> Ave (#1464); and b) a portion of 24<sup>th</sup> Ave S lying north of Butler Pl and south of 8<sup>th</sup> St S (#1465) (vicinity of 2424 and 2428 Butler Pl and 2405, 2425 and 2431 Riverside Ave), for a 333-space surface parking lot, subject to retention of easement rights, and to adopt the related findings prepared by the Department of Community Planning & Economic Development.

Your Committee further recommends passage of the accompanying resolutions vacating said streets.

Adopted 9/2/05.

Resolution 2005R-509, vacating a portion of 8<sup>th</sup> St S lying westerly of the west line of 25<sup>th</sup> Ave S and easterly of the west line of 24<sup>th</sup> Ave (vicinity of 2424 and 2428 Butler Pl and 2405, 2425 and 2431 Riverside Ave), was adopted 9/2/05 by the City Council. A complete copy of this resolution is available for public inspection in the office of the City Clerk.