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1960 Premier Drive
Mankato, MN 56001-5900

Ph: (507) 625-4171
Fax: (507) 625-4177
Bolton-Menk.com

MEMORANDUM

Date: August 5, 2019
To: Jennifer Bromeland, City of Eagle Lake Administrator
From: Matt Lassonde, Transportation Planner, Bolton & Menk, Inc.
Cc: Brian Sarff, City Engineer
Subject: Mankato Motorsports Park – Environmental Review Status Update
City of Eagle Lake, MN
M15.118258

Introduction

This purpose of this memorandum is to provide a status update and communicate a timeline for the environmental assessment worksheet (EAW) review process for the Mankato Motorsports Park development. This memo also reiterates a previous request from Bradford Development (hereafter referred to as the Proposer) for the City of Eagle Lake to revise the zoning ordinance to accommodate the Mankato Motorsports Park development as a conditional use.

Status of Studies Informing the EAW Process

Phase I Archaeological Survey – We have performed a Phase I Archaeological Survey as directed by the State Historic Preservation Office (SHPO). A field review of the site identified a significant number of artifacts, primarily near the western portion of the property within the shoreland zone (see **Attachment 1**). The Phase I Archaeological Survey identifies five artifact cluster find spots of which clusters 1, 2, and 5 have been determined to be significant and would require further excavation and evaluation if proposed to be impacted by track development.

The Proposer has chosen to avoid impacts to clusters 1, 2, and 5 with track design and associated structures on site. By avoiding impacts, no further archaeological investigation is anticipated. At this time, the findings and proposed action are preliminary. A letter will be sent to the SHPO to confirm the findings in relation to the proposed track layout. The results of the archaeological survey will be final upon receiving the approval letter from the SHPO after a 30-day review. We anticipate receiving a letter by mid-September.

Wetland Delineation – The wetland delineation field work has been completed and a report has been submitted. Our team met with the area Technical Evaluation Panel (TEP) consisting of representatives from various environmental agencies including Blue Earth County. The TEP joined wetland specialists from Bolton & Menk, Inc. onsite to confirm the findings from the delineation. **Attachment 1** identifies the final locations of wetlands resulting from the process which has been approved by the TEP. The Proposer will need to take further action if impacts to wetlands are imminent for track development. This includes purchasing wetland credits from a nearby bank to replace any wetland features removed onsite at a 2:1 ratio. For instance, if the proposed development would impact one acre of wetland, the Proposer

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would have to purchase two acres worth of credits to replace. This process can take up to six months to complete. Wetland impacts are anticipated for track development. Wetlands with potential to be impacted are highly degraded by farming and are low quality.

Noise Analysis – The noise analysis began in mid-July with background monitoring completed at the proposed development site. The next step in the noise analysis process is to model noise impacts from the final proposed layout of the track to understand potential impacts to nearby properties that are noise receptors. The noise study is anticipated to conclude in late August.

Traffic Impact Study – The traffic impact study kicked off this week with discussions with the Minnesota Department of Transportation (MnDOT) and Blue Earth County regarding access to the site. MnDOT has confirmed that access directly from U.S. Highway 14 will not be allowed. Blue Earth County, who is currently working on improving County Highway 27, is working with the Proposer to secure right-of-way and stormwater treatment locations along the site's eastern border with the roadway. The traffic impact study will provide an understanding of potential impacts of the development including additional trips generated and will make recommendations for access treatments to effectively serve the track development. The study is anticipated to conclude in late August.

EAW Timeline

The attached timeline for the EAW shows the anticipated timeframes for the aforementioned studies as well as several actions that must be completed by the Proposer and the City of Eagle Lake for the EAW to be completed in 2019. We understand that the City of Eagle Lake and Le Ray Township will attempt to come to an agreement on the joint resolution for annexation in early August. Approval of the joint resolution for annexation during August is vital to the project moving forward. Once annexation is approved by the City and the Township, the annexation will be submitted to the State of Minnesota for a 30-day review period. The City can annex the property only after approval from the State is received. Any delay in this process would push the EAW process into 2020. The EAW must be submitted after finalization of the annexation process and the City's approvals/issuance of any permits allowing construction.

The timeline indicates our team will be ready to provide the City of Eagle Lake a preliminary draft of the EAW document for review in mid-September if actions meet the scheduled timeline. As mentioned during previous meetings, the Proposer will incur the costs of a third-party consultant on behalf of the City of Eagle Lake to review the EAW draft our team is developing.

City of Eagle Lake Zoning Ordinance Revision Request

The Proposer is asking the City of Eagle Lake to again consider revisions to the zoning ordinance to incorporate the Mankato Motorsports Park development as a conditional use. Revisions to the zoning ordinance now would ensure the property is able to be appropriately zoned upon annexation to accommodate the development. This would assist with timely construction of the Mankato Motorsports Park keeping in line with the Proposer's timeline. This will also demonstrate the City's commitment to the success of development implementation, providing confidence to partners hoping to invest in the development.

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Conclusion

The Phase I Archaeological Survey is complete and has found significant artifacts onsite that will need to be considered with the development. The Proposer will send the survey to the State Historic Preservation Office to seek approval on the evaluation. The Proposer plans to avoid impacts to archaeological resources in track development. The wetland delineation field review is complete, and a report has been approved by the TEP. The TEP met on July 8th to confirm the findings. The noise analysis and traffic studies have both begun and are anticipated to conclude in late August. The Proposer is working with State and County officials to ensure access is well planned.

The EAW Timeline indicates that a lack of approvals on the joint agreement for annexation may push the project EAW process into 2020. Bolton & Menk is aiming to provide the City a draft EAW document for their review by mid-September. The EAW must be submitted after the annexation is finalized and approvals/issuance of permits allowing construction.

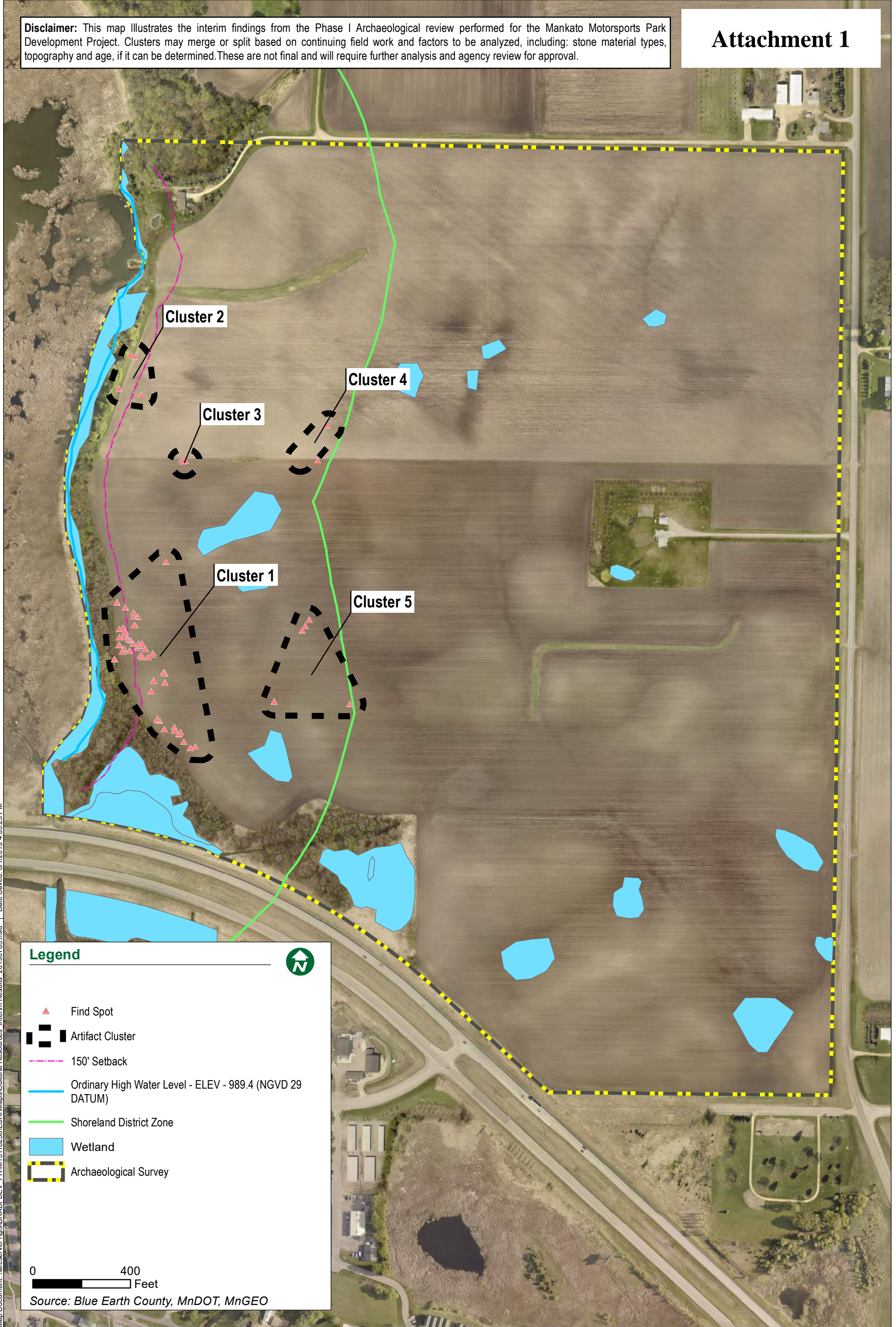
The Proposer is asking the City Council to again consider revising the zoning ordinance to accommodate the Mankato Motorsports Park use prior to annexation of the property to show commitment and ensure construction timelines can be met.

Please feel free to contact Matt Lassonde at 507-625-4171 ext. 3136 or matthew.lassonde@bolton-menk.com with any questions or concerns you may have.



Disclaimer: This map illustrates the interim findings from the Phase I Archaeological review performed for the Mankato Motorsports Park Development Project. Clusters may merge or split based on continuing field work and factors to be analyzed, including: stone material types, topography and age, if it can be determined. These are not final and will require further analysis and agency review for approval.

Attachment 1



Legend

- Find Spot
- Artifact Cluster
- 150' Setback
- Ordinary High Water Level - ELEV - 989.4 (NGVD 29 DATUM)
- Shoreland District Zone
- Wetland
- Archaeological Survey

0 400
Feet

Source: Blue Earth County, MnDOT, MnGEO

Map Document: \\arcserver1gis\BRADFDEV\PRIM\15118259\ESRI\Maps\Cultural Resources - Interim Results - 20190703.mxd | Date Saved: 8/1/2019 4:03:25 PM

EAW Timeline															
July	August			September			October			November			December		
	early	mid	late	early	mid	late	early	mid	late	early	mid	late	early	mid	late
	City Approves Joint Resolution for Annexation	Township Approves Joint Resolution for Annexation	State Approves Annexation 30-Day Review			City Annexes Property									
Need Project Layout	Submit Report to SHPO*	30-day SHPO Response													
	Noise Study		Traffic Study												
							Draft EAW to City for Signatures	Submit EAW to EQB	30-Day Public Comment Period Ends		Draft ROD** / FONSI***	City Review & Sign ROD / FONSI	Distribute ROD / FONSI		

* SHPO - "State Historic Preservation Office"

** ROD - "Record of Decision"

*** FONSI - "Findings of No Significant Impacts"

Attachment 2 - EAW Timeline