

**CITY COUNCIL STAFF REPORT**

Meeting Date August 25, 2025

**REPORT TO:** Michael Sable, City Manager

**REPORT FROM:** Michael Martin, AICP, Assistant Community Development Director

**PRESENTER:** Danette Parr, Community Development Director

**AGENDA ITEM:** Resolution Approving the Record of Decision for Century Ponds Development

**Action Requested:**  Motion  Discussion  Public Hearing

**Form of Action:**  Resolution  Ordinance  Contract/Agreement  Proclamation

**Policy Issue:**

The city council needs to determine if the findings of fact and record of decision for the Century Ponds Environmental Assessment Worksheet (EAW) satisfy the requirements for making a negative declaration regarding the need for an Environmental Impact Statement (EIS).

**Recommended Action:**

Motion to approve the resolution approving the record of decision and the negative declaration of the need for an Environmental Impact Statement for the Century Ponds Development.

**Fiscal Impact:**

Is There a Fiscal Impact?  No  Yes, the true or estimated cost is \$0.00

Financing source(s):  Adopted Budget  Budget Modification  New Revenue Source  
 Use of Reserves  Other: n/a

**Strategic Plan Relevance:**

Community Inclusiveness  Financial & Asset Mgmt  Environmental Stewardship  
 Integrated Communication  Operational Effectiveness  Targeted Redevelopment

State statute requires an EAW to be processed and considered for the Century Ponds project.

**Background:**

The purpose of an Environmental Assessment Worksheet (EAW) is to examine the potential environmental impacts of a proposed project. The City of Maplewood is the Responsible Governmental Unit (RGU) for this EAW. If a project is determined to have the potential for significant environmental effects, further environmental review in the form of an EIS is required.

The EAW analyzed the potential environmental impacts of the Century Ponds project. This project proposes a residential development with single-family homes and townhomes on a 92.25-acre

former golf course in Maplewood, located at the southwest corner of Lower Afton Road East and Century Avenue South. The development will include internal roads and connections to municipal utilities.

The EAW was distributed to the necessary jurisdictions and published in the EQB Monitor on July 1, 2025, initiating a 30-day public comment period that concluded on July 31, 2025.

During this period, the city received comments from five agencies: the Minnesota Department of Transportation, Minnesota Pollution Control Agency, Metropolitan Council, Minnesota Department of Natural Resources (MnDNR), and the Ramsey Washington Metro Watershed District (RWMCD). Key themes from these agencies included:

- Clarifying wastewater flows and improvements
- Acknowledging the Comprehensive Plan amendment process through the Met Council
- Considering water quality and energy conservation strategies
- Coordinating with MnDNR regarding Sullivant's milkweed
- Inquiring about the soil contamination investigation status
- Ensuring the developer adheres to RWMCD's requirements

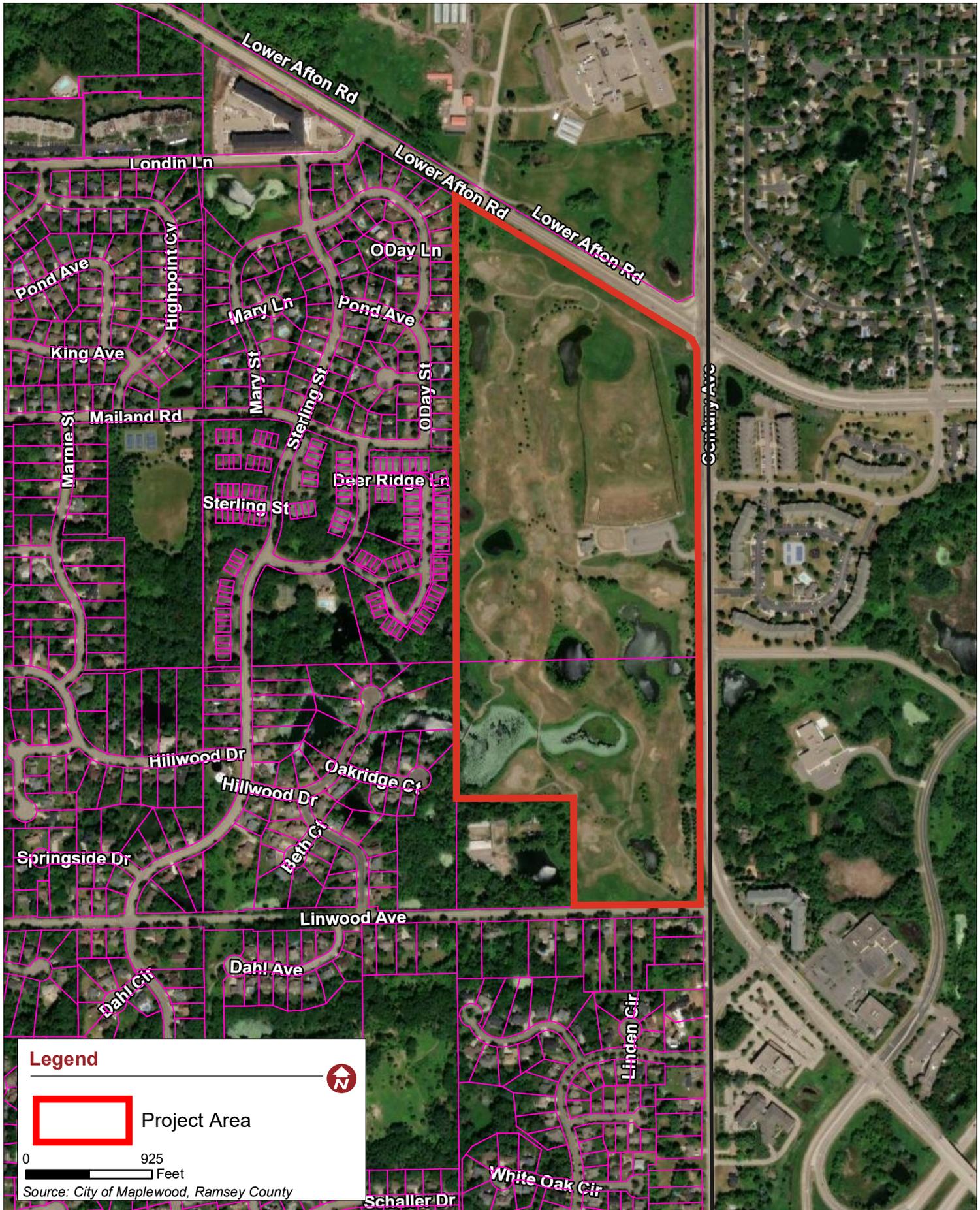
Additionally, five comments were received from the general public, focusing on:

- Concerns about water, wildlife, and traffic impacts from the development
- Questions about sidewalks, vegetation, and utility connections to nearby residents

The attached findings of fact and record of decision document include all agency and general public comments and responses. In addition, the EAW document can be found on the project page located at [www.maplewoodmn.gov/CenturyPonds](http://www.maplewoodmn.gov/CenturyPonds).

**Attachments:**

1. Overview Map
2. Resolution Approving the Record of Decision and the Negative Declaration of the Need for an Environmental Impact Statement for the Proposed Century Ponds Development
3. Response to Comments, Findings of Fact, and Record of Decision
4. PowerPoint Presentation



**CITY OF MAPLEWOOD, MINNESOTA**

**RESOLUTION \_\_\_\_\_**

**RESOLUTION APPROVING THE RECORD OF DECISION AND THE NEGATIVE  
DECLARATION OF THE NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR  
THE CENTURY PONDS DEVELOPMENT**

**WHEREAS**, DR Horton, Inc. (the “Proposer”) proposes to redevelop a 92.25-acre former golf course site to construct 134 single-family homes and 73 townhomes for a total of 207 units located in the southwest quadrant of Lower Afton Rd E (CSAH 39) and Century Ave S (CSAH 25) in Maplewood (the “Project”); and

**WHEREAS**, the Project crosses the threshold of a mandatory environmental assessment worksheet (“EAW”) for a residential development consistent per Minnesota Rules, Part 4410.4300, subpart 19(C); and

**WHEREAS**, the EQB has designated the City of Maplewood (the “City”) as the Responsible Governmental Unit (“RGU”) for the Project pursuant to the Minnesota Environmental Policy Act and Minnesota Rules, Chapter 4410; and

**WHEREAS**, the EAW was prepared by Alliant Engineering on behalf of the Proposer, who submitted completed data portions of the EAW to the City consistent with Minnesota Rules, Part 4410.1400; and

**WHEREAS**, the City retained Kimley-Horn and Associates, Inc. (the “Consultant”) to assist the City in reviewing the EAW and completing the EAW process; and

**WHEREAS**, the EAW was prepared using the form approved by the Minnesota Environmental Quality Board (“EQB”) for EAWs in accordance with Minnesota Rules, Part 4410.1300; and

**WHEREAS**, the City submitted a copy of the EAW to all public agencies on the EAW distribution list and published the EAW in the EQB Monitor on July 1, 2025, in accordance with applicable state laws, rules, and regulations; and

**WHEREAS**, the EAW comment period lasted from July 1, 2025 to July 31, 2025, and five regulatory agencies and five members of the public submitted written comments during the comment period; and

**WHEREAS**, the City acknowledges the comments received from the Metropolitan Council, Minnesota Department of Natural Resources, Minnesota Department of Transportation, Minnesota Pollution Control Agency, Ramsey-Washington Metro Watershed District and five members of the public; and

**WHEREAS**, Minnesota Rules, Part 4410.1700, subpart 6 require the City to determine whether the Project has the potential for significant environmental effects requiring the preparation of an environmental impact statement (“EIS”); and

**WHEREAS**, Minnesota Rules, Part 4410.1700, subpart 7 further require the City to consider the following factors in making such determination:

- a. Type, extent, and reversibility of environmental effects;
- b. Cumulative potential effects: whether the cumulative potential effect is significant; whether the contribution from the Project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the Project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the Proposer to minimize the contributions from the Project;
- c. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority; and
- d. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the Project Proposer, including other environmental impact statements; and

**WHEREAS**, at its meeting on August 25, 2025, the City Council considered the Response to Comments, Findings of Fact, and Record of Decision prepared by the Consultant and which is the Response to Comments, Findings of Fact, and Record of Decision; and

**WHEREAS**, City staff reviewed the Response to Comments, Findings of Fact, and Record of Decision and finds it to be consistent with the evidence submitted to the City and the applicable statutes and regulations, to the best of their knowledge, and recommends the City Council approve them and determine that no EIS is necessary, reasonable or warranted with respect to the Project under the circumstances; and

**WHEREAS**, the City Council desires to make and approve the Response to Comments, Findings of Fact, and Record of Decision and determine that no EIS is required with respect to the Project (“Negative Declaration”).

**NOW, THEREFORE, BE IT RESOLVED**, after careful consideration and based on all of the evidence presented by the Consultant, the Proposer, and other persons or otherwise known to the RGU, the City Council adopts and approves the Response to Comments, Findings of Fact, and Record of Decision for the Century Ponds Development Environmental Assessment Worksheet in the form which is Response to Comments, Findings of Fact, and Record of Decision.

**BE IT FURTHER RESOLVED**, the City Council determines that the EAW was prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minnesota Rules, Parts 4410.1000 to 4410.1700.

**BE IT FURTHER RESOLVED**, the City Council determines that, the EAW satisfactorily addressed the issues for which existing information could have been reasonably obtained.

**BE IT FURTHER RESOLVED**, the City Council determines that the Project does not have the potential for significant environmental effects based upon the above findings and the evaluation of the criteria in accordance with Minnesota Rules, Part 4410.1700, subpart 7.

**BE IT FURTHER RESOLVED**, the City Council determines that the Negative Declaration is appropriate and no EIS is required for the Project pursuant to the Minnesota Environmental Policy Act or Minnesota Rules, Chapter 4410.

**BE IT FINALLY RESOLVED**, that the City staff and consultants are hereby authorized and directed to take all necessary steps and actions, including the execution of necessary documents, to otherwise complete the environmental review process and to accomplish the intent of this Resolution and the Negative Declaration. The City Clerk is specifically authorized and directed to mail a copy of this Resolution to the Proposer and anyone who submitted timely and substantive comments within five days of the date it was adopted. The City Clerk is also specifically authorized and directed to submit this Resolution for distribution in the EQB Monitor.

Adopted this 25th day of August, 2025.

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Marylee Abrams, Mayor

ATTEST:

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Andrea Sindt, City Clerk

# CENTURY PONDS

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## RESPONSE TO COMMENTS, FINDINGS OF FACT, AND RECORD OF DECISION

**CITY:** MAPLEWOOD

**COUNTY:** RAMSEY

### Responsible Governmental Unit (RGU)

**City of Maplewood**  
**1830 County Road B**  
**Maplewood, MN 55109**  
<https://maplewoodmn.gov/>

August 2025

*Prepared by:*



**ALLIANT**

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## Tables

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**Table 5 (from EAW).** Land Cover of the Project Site Before and After the Proposed Development

**Table 6 (from EAW).** Green Infrastructure of the Project Site Before and After the Proposed Development

**Table 7 (from EAW):** Required Permits and Approvals for Proposed Project

## Appendices

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**Appendix A.** Agency and Public Comments Submitted to the City of Maplewood

**Appendix B.** City of Maplewood Resolution Finding of No Need for EIS

## 1. INTRODUCTION

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The Century Ponds project is a proposed low-density development consisting of single-family homes and townhomes on a 92.25 acre former golf course in the City of Maplewood, Ramsey County, Minnesota. It is located in the southwest quadrant of Lower Afton Rd E (CSAH 39) and Century Ave S (CSAH 25) and will include internal roads and connection to municipal utilities.

An Environmental Assessment Worksheet (EAW) was prepared pursuant to Minnesota Rules Part 4410.4430, Subp. 19. Residential Development. The EAW and the respective comments have been reviewed in accordance with Minnesota Rules 4410.1700 to determine if the project has potential for significant environmental effects. This document includes responses to comments received by the City of Maplewood, the Findings of Fact supporting the decision, and the Record of Decision indicating an Environmental Impact Statement (EIS) is not necessary for this project.

## 2. EAW NOTIFICATION, DISTRIBUTION, AND COMMENT PERIOD

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In accordance with Minnesota Rules 4410.1500, the EAW was completed and distributed to persons and agencies on the office of Environmental Quality Board (EQB) distribution list. The notification was published in the EQB Monitor on July 1, 2025, initiating the 30-day public comment period. A news release was published on June 27, 2025 on the City of Maplewood's website providing the general public with access to the EAW document. The comment period ended on July 31, 2025.

## 3. COMMENTS RECEIVED

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GOVERNMENT AGENCIES:

The City received comment letters from five government agencies. These include:

- Minnesota Department of Transportation (MnDOT) – dated July 3, 2025
- Minnesota Pollution Control Agency (MPCA) – dated July 21, 2025
- Metropolitan Council (Met Council) – dated July 30, 2025
- Minnesota Department of Natural Resources (MN DNR) – dated July 31, 2025
- Ramsey Washington Metro Watershed District (RWMWD) – dated July 22, 2025

None of the comments recommended the preparation of an EIS.

#### GENERAL PUBLIC COMMENTS:

The City received five comments from the general public. These include:

- Stuart Bestland – dated July 8, 2025
- Michael Hager – dated July 30, 2025
- Oliver of Gladstone, Maplehood United – dated July 30, 2025
- John Zakelji, President of Friends of Maplewood Nature – dated July 30, 2025
- Shelley Buck – dated July 31, 2025

## 4. RESPONSE TO COMMENTS

This document responds to comments individually. It includes summaries of comments followed by responses. The complete comment letters and emails are included in **Appendix A**. Responses to comments are generally confined to substantive issues that “address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation before the project is commenced, and the need for an EIS on the proposed project.” (MN Rules 4410.1600). Some of the comments included general remarks or recommendations. Such comments are noted for the record and further detail of the statements or recommendations is included in **Appendix A**.

### 4.1 COMMENTS FROM GOVERNMENT AGENCIES

#### 4.1.1 MnDOT

**Comment:** MnDOT has reviewed the EAW and has no comments since the proposed project should have little or no impact on MnDOT’s highway system

**Response:** This comment has been noted for the record.

#### 4.1.2 MPCA

**Comment:** Wastewater – Section 12.b.i.1 states that the project is expected to add approximately 145 pounds per day to the sanitary sewer which equates to approximately 17 gallons per day. These values should be clarified. Projects served by Metropolitan Council Environmental Services (MCES) typically use 274 gallons per day (gpd) per home for planning purposes. With 207 homes that would result in an average daily design flow of 56,718 gpd.

**Response:** These values should be updated to the City of Maplewood’s predicted flow rate of 275 gal./unit/day per 1 parcel as referenced in the City’s comprehensive sanitary sewer plan. Therefore, the average daily design flow for sanitary sewer would be 56,925 gallons per day. This correction is summarized below in the Finding of Facts section.

**Comment:** Wastewater – this section also mentions that other improvements are needed to the sanitary sewer system that the project will connect to. More details about those improvements necessary for the project should be provided. A location map showing the sewer route to the wastewater treatment plant and where improvements are needed should be provided.

**Response:** This section mentions that the City of Maplewood’s 2040 Comprehensive Plan involves improvements to sanitary sewer system throughout the city to meet the needs of increased development throughout the area. However, there are no improvements that are needed to the existing system that the development ties into meet the demands of the proposed development.

The site is proposed to be served by an existing stub at MH18 along regional interceptor 1-MW-410 located near the northwest corner of the property and at an existing City of Woodbury sanitary stub located in the southwest corner (off Century Ave.). There will be no improvements made to the existing sanitary systems that the proposed development is tied into. Wastewater will follow its current existing route to the MCES Metro Plant.

#### 4.1.3 Met Council

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**Comment:** Item 7 – Climate. Discussion of anticipated climate trends is adequate. In addition to native plants, the project proposer should consider climate adapted vegetation to better withstand and mitigate the impacts of drought and large rain events. In Table 5, Land Cover of the Project Site Before and After Proposed Development, 39 acres of “Residential” are identified in the “After” column. Met Council staff notes that “Resident” is a land use and not a land cover. Council staff recommend showing the 39 acres of “Residential” as either “Impervious surface” or “Lawn/Landscaping” to better reflect the changing conditions and climate adaptation and resilience impacts.

**Response:** This comment has been noted for the record. The correction the land cover table in the EAW is summarized below in the Finding of Facts section.

**Comment:** Item 10 – Land Use – Comprehensive Plan. The City will need to amend the 2040 future land use map so the adopted 2040 plan is consistent with the proposed development. The proposal includes 239 new homes in a mix of detached single family and townhomes. The site is guided Park; and to develop as proposed, a residential designation is needed.

**Response:** The City is aware of the amendment. As part of the land entitlement process, the project proposer will be including a comprehensive plan amendment and rezoning application to change the site’s guided Park designation to residential.

**Comment:** Item 10 – Land Use – Forecasts. This expected development fits within the current 2040 and 2050 forecast for the community. The City may consider requesting a forecast adjustment if the proposed development will be built and absorbed before the 2030 Census; please contact Met Council Community Development staff to discuss.

**Response:** This comment has been noted for the record.

**Comment:** Water Resources – Sanitary Sewers. The Metropolitan Disposal System has adequate capacity for this project location. Based on the wastewater information provided in the EAW, the site is proposed to be served either northwest to an existing stub at MH18 along regional interceptor 1-MW-410 or a portion to the northwest and a portion to the southeast to an existing local Woodbury sewer. A direct connect permit is required for the northwest connection to the existing stub on 1-MW-410. Contact Tim Wedin, Interceptor Engineering at the Metropolitan Council Environmental Services regarding this connection.

Service to the southeast through Woodbury’s local system represents unmetered flow from Maplewood to Woodbury, with the flow eventually being captured at Woodbury’s billing meter, M018. An intercommunity agreement with Woodbury to determine how wastewater billing will be handled is required. There are existing agreements in place between the two cities. One of those agreements is for the Century Avenue sewer and could potentially be updated to include the proposed new service area. An MPCA sanitary sewer extension permit is also required, which includes Metropolitan Council review and approval. Please reach out to David Sahli at MPCA regarding the MPCA sanitary sewer extension permit.

An amendment to the adopted 2040 Plan is required before review of the MPCA sanitary sewer extension permit application and the Metropolitan Council direct connect permit application be completed.

**Response:** The project proposer is aware of the required sanitary sewer permits that are required and will obtain these permits prior to project construction.

**Comment:** Water Resources – Water Supply. Development and redevelopment, particularly at the scale of this proposal, provide several opportunities to incorporate practices that improve water efficiency and protect water quality. As more site-specific plans are developed, Council staff encourage the City to identify risks to water quality and incorporate mitigation strategies that protect surface water and groundwater resources. We also encourage City to identify and implement opportunities for water conservation and efficiency, to minimize any increases in water demand.

**Response:** The site is designed to meet the local and state requirements to protect water quality. Water conservation strategies may be identified during the plan’s approval process.

**Comment:** Greenhouse Gas Emissions. The anticipated greenhouse gas emissions are reasonable and the proposed mitigation measures are appropriate. The proposer should consider use of energy conservation planting strategies, such as vegetation that provides shade

to east and west-facing windows while avoiding shade to south-facing windows to maximize solar exposure during the winter and minimize solar exposure in the summer.

**Response:** The project proposer has received your comment for consideration on using energy conservation planting strategies.

#### 4.1.4 MN DNR

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**Comment:** The DNR appreciates that native seed mixes will be utilized within the development, especially because the project area is located within a High Potential Zone for the federally-endangered rusty patched bumble bee. Please note that further coordination with DNR is required regarding the state-threatened Sullivant’s milkweed that has been found on site. The project proposed should contact [reports.nhis@state.mn.us](mailto:reports.nhis@state.mn.us) with further information about the location and number of individuals present in order to discuss approved avoidance measures and/or the need for a Permit to Take.

**Response:** The project proposer is aware of the requirements for Sullivant’s milkweed and will coordinate with the DNR about determining the appropriate avoidance measures and/or need for a Permit to Take.

#### 4.1.5 RWMWD

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**Comment:** Section 7 (Table 4) of the EAW describes the climate adaption strategies, including a statement that “98% of the site will be enhanced open/natural area,” however, the current plan shows less than 98% open/natural area under proposed conditions.

**Response:** This is an error in the EAW document. The proposed enhanced open/natural area on site will compromise approximately 24% of the site.

**Comment:** Section 7 (Table 4) of the EAW states there is “low risk” for contamination as a result of the project. Is there any evidence of existing soil or water contamination from previous land uses? What level of geotechnical investigation has been completed for any potential existing contamination that may be disturbed through proposed grading and/or excavation activities?

**Response:** A Phase I and Phase II environmental site assessment (ESA) were previously completed on the site by AET. The results of the Phase II indicated that the concentrations of agricultural chemicals on site are likely natural occurring and not indicative of a release. Therefore, the Phase II did not recommend further investigation or cleanup of the site. The proposed grading and excavation activities are not anticipated to encounter any contamination on site.

**Comment:** Section 10.a.iii states that the “nearest floodplain is approximately one mile north of the project site;” however, RWMWD regulates all areas modeled to be inundated in the 100-year rainfall event as floodplain. Per comments provided to the applicant in Feb 2025, the project design will need to include cut/fill volumes below the 100-year water surface elevation in each wetland and floodplain area based on the RWMWD stormwater model to demonstrate RWMWD Rule D requirements are met.

**Response:** The design engineer received the comment on the February 2025 submittal. The next submittal package will include the requested cut/fill volumes below the 100-year water surface elevation to meet the RWMWD Rule D requirements.

**Comment:** Section 11 of the EAW states that approximately “300,000 cubic yards of soil movement” is expected during the project. RWMWD recommends disturbance of the site in phases to more effectively implement the erosion and sediment control plan and Stormwater Pollution Prevention Plan (SWPPP).

**Response:** The project proposer will work with the contractor to phase grading as efficiently as possible for the site.

**Comment:** Section 12.b.ii of the EAW indicates that “most runoff will remain onsite by traveling to the wetlands or into the constructed stormwater ponds.” RWMWD Rule C requires that stormwater runoff directed to wetland areas is pretreated. Due to the acreage proposed to be disturbed, temporary sediment ponds will be required per the state’s NPDES permit requirements and RWMWD Rule F.

**Response:** The design engineer is aware of RWMWD’s Rule C requiring stormwater runoff to be pre-treated in stormwater basins before draining into the wetlands on site. Stormwater on site will be routed to temporary sediment ponds during construction and permanent stormwater basins post construction to be treated before draining into the wetlands on site. The stormwater for the proposed development is designed to meet the City of Maplewood, RWMWD, the MPCA’s NPDES permit requirements.

**Comment:** Section 21.c. of the EAW references an incorrect infiltration requirement. Per the watershed district, 1.1” of runoff from impervious surfaces is required to be captured and infiltrated onsite. Where infiltration is not feasible due to poor soils, additional volume is required to be captured and filtered in accordance with RWMWD Rule C.

**Response:** The design engineer is aware of RWMWD’s Rule C and the 1.1” of runoff from impervious surfaces. The soils on-site are not suitable for infiltration; therefore, the stormwater management system will use filtration systems per RWMCD’s requirements.

**Comment:** Based on findings from Section 14 of the EAW, care should be taken to preserve habitat and protect species that are endangered, threatened, or of special concern, including Henslow’s sparrow, Sullivant’s milkweed, Northern long-eared bat, monarch butterfly, and Rusty patched bumble bee. If the proposed development is approved, RWMWD implements grant funding for water quality practices and native habitat restoration. Coordination on any additional water quality or habitat improvements could be made with RWMWD staff; however, the project must first demonstrate meeting the minimum permit requirements.

**Response:** This comment has been noted for the record.

## 4.2 COMMENTS FROM THE GENERAL PUBLIC

### 4.2.1 Stuart Bestland

**Comment:** D.R. Horton has a history of hiring illegal aliens for their construction work sites. What assurances and compliance verification processes are in place to ensure that illegal immigrants are not being employed at this job site? Whether they are being hired directly or by a subcontractor.

**Response:** The EAW document is a planning document that addresses categories of social, economic, and environmental issues potentially present on a project. This comment is not related to addressing the accuracy and/or completeness of the EAW and is not relevant to the content of the EAW.

### 4.2.2 Michael Hager

**Comment:** Environment – regardless of DR Horton’s assertion the animals and environment would not be impacted in any meaningful way it is incompressible given the number of single-family homes and townhomes of that magnitude including roads to carry the additional traffic will impact the following:

- Impact to endangered/threatened species – Rusty Patched Bumble Bee, Northern Long Eared Bat and Monarch butterflies
- Protection of animals including turkeys, deer, and coyotes
- Increase of noise and light pollution from new homes and townhomes, streetlights, and increased vehicle traffic
- Negative impact of run-off caused by fertilizer, gas, oil, and rainwater in such a small area

**Response:** The EAW acknowledges that impacts to some plants and wildlife will be unavoidable with the proposed design. However, the proposed design is mindful of creating a large area of contiguous native species habitat that will benefit plant and wildlife species after the development is created. In addition to the proposed landscaping plan, this native enhancement area creates a buffer between existing residential areas adjacent to the site to reduce noise and light pollution from the development. The proposed development follows the Ramsey-Washington Metro Watershed District rules to route stormwater to stormwater basins to pre-treat the water before it flows into the surrounding wetlands thus enhancing the water quality of the wetlands on site.

**Comment:** Safety – this D.R. Horton will increase the overall risk of those living in the existing neighborhood in the following ways:

- Increased vehicle traffic. The City has already acknowledged the frequency of cars driving on Linwood Ave. at excessive speeds. Adding additional single-family homes and

townhomes will increase the traffic on Linwood Ave. and will further exacerbate an already unsafe road for neighbors driving and walking on Linwood Ave.

- There are currently no sidewalks on Linwood Ave. on either side of the street and with the new D.R. Horton development there are no proposed sidewalks to ensure the safety of people walking on Linwood Ave. even though vehicle traffic will increase.

**Response:** The County required that the traffic from the townhomes proposed in the southern part of the project area have access only through Linwood Ave and not to both Century Ave. S and Linwood Ave. The traffic study in Appendix G of the EAW analyzed the traffic volumes anticipated to Linwood Ave. and found that the existing and proposed conditions along Linwood Ave. are expected to operate safely and efficiently with the additional traffic from the proposed development.

There is a 5' concrete sidewalk proposed along northern Linwood Ave. bordering the proposed townhome area that will connect to the 10' public bituminous trail at the southeast corner of the property near Linwood Ave. This will ensure that pedestrians have a safe area to walk along Linwood Ave.

**Comment:** If a stop sign is added in front of any of the homes on Linwood Ave. it will increase the risk of getting into an accident and additional traffic congestion for the current neighbors.

**Response:** No stop sign is proposed in front of any of the homes on Linwood Ave. A stop sign is only proposed along the west side of the townhome road for vehicles exiting the development onto Linwood Ave.

**Comment:** It seems that the existing homes/neighbors along Linwood Ave. are bearing the brunt of additional traffic which also increases the risk to our safety.

**Response:** The County required that the traffic from the townhomes proposed in the southern part of the project area have access only through Linwood Ave and not to both Century Ave. S and Linwood Ave. The traffic study in Appendix G of the EAW analyzed the traffic volumes anticipated to Linwood Ave. and found that the existing and proposed conditions along Linwood Ave. are expected to operate safely and efficiently with addition of the traffic from the proposed development.

**Comment:** As I have mentioned multiple times at the D.R. Horton public meetings the park/walking path requested by the City Council of D.R. Horton be placed closest to Linwood Ave. to create space next to Linwood Ave. and provide a buffer for the existing homes on Linwood Ave. It would also make it easier for the general public to access the park and not have it hidden deep into the new development which will likely only be used by the people in the D.R. Horton development.

**Response:** The park is centrally located on the proposed development to allow the public to easily access the area from multiple locations bordering the site. In addition, there is a proposed parking area near the park that the public can drive to access the park and the walking trails that connect to it.

**Comment:** It seems unbalanced the proposed townhomes with the smallest lot size is right across from the existing homes on Linwood Ave. that have 1+ acre lots. This will negatively impact property values of the existing homes on Linwood Ave.

**Response:** This comment will be reviewed as part of the City's land entitlement process.

**Comment:** A buffer/set back should be added to the plan to minimize noise and light pollution from those already living on Linwood Ave. This was added to the most recent D.R. Horton proposal for the west side of the development. Why isn't there a similar buffer created for the existing residents of Linwood Ave.? Again, we feel we are bearing the brunt of the burden of the D.R. Horton development compared to other surrounding/existing neighborhoods.

**Response:** The proposed development has a 30-foot setback from the edge of Linwood Ave. right of way to the edge of the first proposed townhomes per the City of Maplewood required setback requirements.

**Comment:** We are requesting a minimum 6-foot berm and vegetation be added to the D.R. Horton development on the Linwood Ave. side to minimize noise and visual pollution to the existing homes on Linwood Ave.

**Response:** The site is designed with the required City of Maplewood setbacks. The proposed development has a 30-foot setback from the edge of the Linwood Ave. right of way to the edge of the first proposed townhomes. To minimize noise and visual pollution, D.R. Horton's landscape plan shows dense landscape plantings to create a buffer between Linwood Ave. and the proposed townhomes. Additionally, the site design proposes to preserve the existing wetland area on the eastern side of the project and create a stormwater basin adjacent to the wetland to the east that borders Linwood Ave. This will create additional buffer and open space between Linwood Ave. residents and the proposed development.

**Comment:** What is the plan for city water and sewer for the existing homes on Linwood Ave.? Is this something that can be discussed with the current residents?

**Response:** The City and project proposer will review the improvements to the utilities in the area as part of the land entitlement process and will update residents in the area on the utility layout for the project.

#### 4.2.3 Oliver of Gladstone, Maplehood United

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**Comment:** The current proposal carves up the site for low-density single-family homes – duplicating a suburban model that's already proven fiscally unsustainable. The spread-out, low-density development like this simply does not generate enough long-term tax revenue to cover the future costs of infrastructure maintenance. I urge the city to allow a broader, more inclusive range of housing type: duplexes, townhomes, small-scale multifamily, cottage courts. I urge the city to reimagine this project through the lens of its 2040 plan, long-term fiscal health, social inclusion, and climate resilience. Consider forming a design task force or using a charrette

process to explore alternative site plans that reflect Strong Towns values and community engagement.

**Response:** The city will consider these policy changes during the comprehensive plan amendment process for the site.

#### 4.2.4 John Zakelji, President of Friends of Maplewood Nature

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**Comment:** The EAW does not acknowledge all of the Rusty patched bumble bee observations at this site. Page 28-29 mentions a “sighting in July 2024 in the northwestern pond area.” Actually, there were two widely separate sightings, one in the northwestern pond area and a second in the south central area, both verified on Bumble Bee Watch. The ecological survey in the EAW, Appendix E, pages 3 and 6, does not acknowledge either of the above 2024 sightings.

**Response:** In the EAW document, there was an inadvertent omission of text clarifying that the project proposer is aware of the separate sightings on the site in July 2024. Based on the data from the Bumble Bee Watch, the sightings are listed as occurring on 7/28/2024 in separate areas of the site as mentioned instead of only in the northwestern pond area. The project proposer is aware of the separate sightings. The ecological survey was conducted in June 2024 and referenced data from the Bumble Bee Watch at that time. The July 2024 sightings were not confirmed at the time that the ecological survey was finalized and thus the ecological survey did not reference these sightings.

**Comment:** Perhaps this is not the role of the EAW, but we ask the city and D.R. Horton to describe how the above environmental mitigation steps will be monitored and maintained in both the short and long term. We look forward to working with the city and D.R. Horton regarding issues such as conservation easements, ownership of natural areas, delineation of responsibility and funding of maintenance of natural areas, public access, short and long term plans for maintenance and preservation of natural areas, and education and encouragement for homeowners and the HOA to provide the natural habitat in yards and other private areas in the development.

**Response:** The project proposer and the City of Maplewood are still discussing how the mitigation steps will be monitored and maintained. The decisions that are made will be included in the developer’s agreement for the project. The project proposer and the City of Maplewood will continue to keep the Friends of Maplewood updated once decisions have been made.

#### 4.2.5 Shelley Buck

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**Comment:** I have serious concerns about the impact this proposed development will have, especially on our plant and animal relatives. To say that bats, cranes, butterflies, and bees “would likely disperse to adjacent and/or similar habitats” is so out of touch and disrespectful to these relatives as well as those of us who love and enjoy them. I also have concerns that D.R.

Horton does not seem apt to do a Phase I archaeological survey simple because it is not required. I strongly suggest you require D.R. Horton to do a Phase I archaeological survey.

**Response:** The comment about wildlife dispersing to adjacent and/or similar habitats is what is anticipated to occur during the construction of the site. In Section 14 of the EAW, the EAW acknowledges that during construction and grading of the site, there will likely be temporary impacts to wildlife on the site. However, after construction, as stated in Section 14 of the EAW, the site is likely to provide additional quality habitat to plant and animal species with the enhancement of the wetland buffers with native seed mix and the large contiguous area of native enhancement area in the southern part of the project site. The project proposer understands the importance of protecting plant and animal species on the site and has sought additional input from the U.S. Fish and Wildlife Service, the Friends of Maplewood, and the City of Maplewood in their design process to ensure that a large area of natural habitat is available to plant and wildlife species with their proposed development.

A Section 106 review is not required for this project; however, as part of the EAW process the Minnesota State Historic Preservation Office was consulted to conduct a review of the site and recommended the Phase I archaeological study. The project proposer is currently looking into having a Phase I archaeological study conducted on the site.

## 5. FINDINGS OF FACT

### 5.1 PROJECT DESCRIPTION

#### 5.1.1 Proposed Project

The Century Ponds project is a proposed low-density development consisting of single-family homes and townhomes on a 92.25-acre former golf course in the City of Maplewood, Ramsey County, Minnesota. It is located in the southwest quadrant of Lower Afton Rd E (CSAH 39) and Century Ave S (CSAH 25) and will include internal roads and connections to municipal utilities.

#### Updates to the EAW based on comments above:

- **Section 7. Climate Adaption and Resilience (Table 4)**  
The project design, adaptation row is updated to state: “24% of the site will be enhanced open/natural area, further ameliorating urban heat islands and extreme temperatures.”
- **Section 8. Cover Types (Table 5 and Table 6)**

**Table 5. Land Cover of the Project Site Before and After the Proposed Development**

Land Cover Type <sup>1</sup>	Before (acres)	After (acres)
Wetlands and shallow lakes (<2 meters deep)	10	10
Wooded/forest <sup>2</sup>	6	6

Grassland <sup>3</sup>	63	0
Green infrastructure TOTAL (from table below*) <sup>4</sup>	11	30
Impervious surface <sup>5</sup>	2	44
Stormwater Pond (wet sedimentation basin) <sup>6</sup>	0	2
<b>TOTAL</b>	<b>92</b>	<b>92</b>

**Notes:**

<sup>1</sup>The total land cover acreage is reported as the sum of the unrounded values.

<sup>2</sup>Wooded/forest: There are pockets of trees throughout the project site. Along the west and east boundaries are the densest forest cover which will remain undisturbed.

<sup>3</sup>Grassland: The majority of the existing grassland here includes the planted turf that was part of the old golf course. The enhancement areas on site will include native grasses and flowering plants and is included in the green infrastructure category.

<sup>4</sup>Green infrastructure: The majority of the green infrastructure category includes the proposed native enhancement areas. See Table 6 below.

<sup>5</sup>Impervious surface: These numbers include the residential pad areas which encompasses the home, driveway, and associated lawn and the proposed neighborhood roads. It does not include current and proposed walking trails.

<sup>6</sup>Detention ponds.

**Table 6. Green Infrastructure of the Project Site Before and After the Proposed Development**

Green Infrastructure	Before (acres)	After (acres)
Constructed infiltration systems (infiltration basins/infiltration trenches/rainwater gardens/bioretention areas without undergrains/swales with impermeable check dams) <sup>1</sup>	0	2
Constructed tree trenches and tree boxes	0	0
Constructed wetlands	2	0
Constructed green roofs	0	0
Constructed permeable pavements	0	0
Other (describe) <sup>2</sup>	9	28
<b>TOTAL</b>	<b>11</b>	<b>30</b>

<sup>1</sup>Filtration basins

<sup>2</sup>Other represents existing habitat areas and proposed enhanced areas.

- **Section 12.b.i.1. Water Resources, Wastewater**

The sentence in the EAW discussing the estimated pounds per day of sanitary sewage from the property is updated to say: “The project is expected to add approximately 56,925 pounds per day to the sanitary sewer which is within the capacity of the MCES Metro Plant. This value is based on the City of Maplewood’s predicted flow rate of 275 gal./unit/day per 1 parcel as referenced in the City’s comprehensive sanitary sewer plan.

- **Section 14. b. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)**

The sentence in the EAW discussing the rusty patched bumble bee sightings in July 2024 is updated to say: “Additionally, in July 2024, the rusty patched bumble bee was found in the northwestern and south central part of the site and is recorded on the Bumble Bee Watch website.”

### 5.1.2 Site Description and Existing Conditions

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The project site was formerly a golf course called the Ponds at Battle Creek that closed in September 2021. The project site is currently zoned as Farm Residential. The majority of land cover is brush, grassland, and wetlands with an abandoned club house and parking lot located towards the center of the project site. There are numerous cart trails located throughout the project site. The land has remained undisturbed since the golf course closed, aside from mowing activity completed by Ramsey County.

### 5.1.3 Decision Regarding the Potential for Significant Environmental Effects

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Minnesota Rules 4410.1700, Subp. 7 lists four criteria that shall be considered in deciding whether a project has the potential for significant environmental effects. Those criteria and the City’s findings are presented below.

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

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Minnesota Rules 4410.1700, Subp. (A) indicates the first factor that the City must consider is the “type, extent, and reversibility of environmental effects.” The City’s findings are set forth below.

- **Climate Adaption and Resilience**  
Analyzing general average annual temperature, total annual precipitation, and the drought severity index, the general trends for eastern Minnesota include warmer temperatures, less precipitation, and more variable and extreme conditions, such as higher maximum temperature and more variable precipitation that could lead to more drought periods. The project has identified adaptations that will be implemented into the development design to mitigate future climate trends in the area.
- **Cover Types**  
The project will convert an approximately 92.25-acre abandoned golf course to low and medium density residential development that will include lawn/landscaping, stormwater infrastructure, open grassland area, and an internal roadway network. The green infrastructure on the site after development will include constructed filtration systems and proposed habitat enhancement areas.
- **Land Use**

A Comprehensive Plan Amendment to reclassify the property as a park into residential development in the City's Comprehensive Plan was applied for by project proposer. The amendment is currently pending approval from the City of Maplewood. The proposed Century Ponds Project is consistent with the envisioned growth of the adjacent land use in the area. There are no special zoning areas identified such as shoreland, floodplain, wild and scenic rivers, critical area, or agricultural preserves on or adjacent to the site.

- **Geology, Soils, and Topography/Land Forms**

Site grading during construction is expected to require an average of 11 feet of cut over 92.25 acres. This yields an estimate of 300,000 cubic yards of soil movement. Grading activities will construct new roads, building residential pads, sidewalks, trails, a park, and stormwater features. During construction, appropriate sediment and stormwater best management practices will be utilized to prevent erosion and runoff from the site. After construction, the soils will be stabilized to minimize erosion and stormwater facilities will regulate surface water runoff to pre-treat water before it drains into surrounding water features.

- **Water Resources**

- **Wetlands and Surface Waters**

Kjolhaug Environmental Services completed a wetland delineation in November 2023 of the site. 14 wetlands were delineated onsite. The Ramsey-Washington Metro Watershed District (RWMWD) approved the wetland delineation and issued a Notice of Decision in May 2024. RWMWD approved that Wetlands 1, 2, 3, 4, 7, and 8 are considered incidental wetlands since they are excavated in historic upland areas. These wetland areas were created as part of the development of the Ponds at Battle Creek golf course in 2002. Incidental wetlands, as defined under the Wetland Conservation Act, are wetlands that were created in non-wetland areas and impacts to these features are not regulated.

- **Wastewater**

The project is expected to produce normal domestic wastewater that will be typical of residential development and will be designed within the limitations of the existing sanitary sewer system. The project is proposed to be connected to the existing stub in the northwest corner of the property to serve the northern part of the site and the southern part of the site will connect to the City of Woodbury's sanitary stub located in the southeast corner (off Century Ave.) to serve the townhomes. By splitting the sanitary sewer into north and south

service areas, it will lead to less construction activities impacting the wetlands located in the central part of the site central wetland area.

- **Water Quality**  
 Compliance with stormwater requirements will minimize and mitigate potential adverse effects on receiving water. Project construction will add impervious surfaces to the site which consists of streets, residential homes, and driveways. Stormwater rate and volume controls will limit increases in runoff volume and associated pollutant transport. Runoff will be pretreated in stormwater basins on site before draining into surrounding wetlands and stormwater runoff quality and quantity will be designed to meet the City of Maplewood, Ramsey Washington Metro Watershed District, and the MPCA's National Pollutant Discharge and State Disposal System (NPDES/SDS). This will mitigate potential adverse effects on water quality.
- **Water Appropriation**  
 Temporary groundwater appropriation may be necessary during construction for mass grading and to install utilities. The irrigation well on site will be abandoned and sealed prior to redevelopment. The proposed development will connect to St. Paul Regional Water Services.
- **Contamination/Hazardous Materials/Wastes**  
 The Minnesota Pollution Control Agency's (MPCA) "What's in my Neighborhood" (WIMN) search indicated that there is one known or documented existing contamination hazard in the project site – an active and permitted hazardous waste generator, very small quantity, associated with the prior golf course. The generator will be removed prior to the construction grading and disposed of at an approved waste facility. Within 0.5 miles of the project, there are 41 known or documented contamination hazards. The MPCA's website indicates that these sites have been properly investigated and managed. Therefore, these sites are not expected to adversely impact the project site.
- **Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)**  
 The project is expected to convert approximately 76 acres of golf course grassland and existing impervious surface into residential development, stormwater features, and open grassland habitat. The existing natural wetlands on site will be preserved in their existing state as part of the development. During construction, the mobile wildlife present on the project site will likely disperse to adjacent and/or similar habitats. Areas previously planted with native and non-native flowering plants may be disturbed during construction. However, as part of the development, protective buffers will be created around preserved wetlands and open space will be reestablished with native vegetation and trees, creating suitable habitat and resources for small birds, mammals, and insects,

including pollinators. If a threatened and endangered species survey is necessary for the project, it will be completed prior to construction to ensure appropriate avoidance and minimization measures are taken.

- **Historic Properties**

There are no historic properties or archaeological sites identified on the project site. The SHPO review letter stated that there has been prior disturbance of the site due to the golf course, and that due to the site's proximity to archaeological sites found off-site, a Phase I archaeological survey is recommended.

- **Visual**

Unique scenic views include several natural wetlands with native vegetation and wildlife on site. Century Ponds will not create any unusual visual impacts. The visual effect will transition views from predominately open brush and grassland to single family homes, townhomes, public access roads, and stormwater basins. The site will maintain a large open contiguous area in the southern part of the project site.

- **Air**

Dust will be generated during the construction process on the site. Mitigation of the short-term dust and odors impacts will be managed through proper coordination and construction planning.

The proposed residential subdivision will generate small sources of stationary source emissions through natural gas/electricity used in heating and cooling of the homes. This will result in direct and indirect sources of stationary greenhouse gas emissions (GHG) at a small quantity. Emissions are expected to be similar to those of the single-family and multi-family residential units near the site.

The project does not require an indirect source permit. No baseline air quality monitoring or modeling is proposed and no measures to mitigate the increase in vehicle related emissions are being considered.

- **Greenhouse Gas (GHG) Emissions Carbon Footprint**

The greenhouse gases that will be emitted during the project's lifetime include construction vehicles, land use conversion, off-site utilities, residential vehicle usage, and off-site waste management. The development will incorporate mitigation measures into the design and development of the project to reduce the project's GHG emissions.

- **Noise**

Noise levels will temporarily increase during construction of the site then stay consistent with the residential development adjacent to the property when construction is completed. The nearest receptors to the site are single family residential homes, apartment complexes, a retirement community, and a correctional facility. Noise levels

on site will vary during construction depending on where construction is occurring on site, time of operation, and distance between receptors and construction equipment.

Construction noise can be mitigated by restricting construction work to daytime hours. Contractors will be required to minimize noise impacts by maintaining equipment properly, including noise controls as specified by manufacturers. The project will adhere to the Maplewood noise rules and standards that indicates noise should occur within specified levels depending on land use and time of day.

After construction, noise levels are expected to be at or near existing levels for a typical residential development. Where berms and landscaping will be used to provide noise mitigation for the surrounding residents and businesses. Similar to construction noise, the residential use of the property will adhere to the City's noise rules and standards. The St. Paul gun range will continue to be a source of noise once construction is completed. Based on a sound study performed on site, it was recommended that windows on townhomes on the south side of the site, facing the range, be doubled paned to mitigate noise.

- **Transportation**

A Traffic Study was completed in 2025 to analyze the concept plan for the site. Operations analysis results identify a Level of Service (LOS) which indicates the quality of traffic flow through an intersection. Intersections are given a ranking from LOS A through LOS F. LOS A indicates the best traffic operation with vehicles experiencing minimal delays. LOS F indicates an intersection where demand exceeds capacity, or a breakdown of traffic flow.

Based on the traffic operations analysis of existing conditions, all study intersections operate adequately under existing AM and PM peak hours. The signalized intersections (Century Avenue and Lower Afton Road/Valley Creek Road, Century Avenue/Lake Road and Century Avenue/Apartments) operate at overall intersection LOS B or better. Through/stop intersections (Century Avenue with Parkwood Drive, Pouliot Parkway, and Linwood Avenue) operate acceptably with overall intersection LOS A and minimal side-street delay (LOS A).

Overall, the proposed development is expected to have minimal impact to the existing transportation system. Traffic impacts will be further analyzed during the City's preliminary plat review process. Any traffic mitigation identified in the review will be implemented with project construction. This will include both vehicular and pedestrian improvements and turn lane recommendations.

## B. Cumulative Potential Effects

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Minnesota Rule 4410.1700, Subp. 7 (B) indicates that the second factor the City must consider is whether the proposed project has potentially significant cumulative effects. This includes “whether the cumulative potential effect is significant, whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the project proposer to minimize the contributions from the project.” The City’s findings are described below.

The potential cumulative effects on public infrastructure include municipal water supply systems, sanitary sewer conveyance and treatment systems, stormwater management systems, traffic and transportation systems. The development will be connected to the watermain, which is proposed to be extended from the existing service stubs on Lower Afton Road, Mailand Road right-of-way and Linwood Avenue to create a looped system. Sanitary sewer is proposed to be connected to the existing stub in the northwest corner of the property to serve the single family residential homes and to the City of Woodbury’s sanitary stub located in the southeast corner (off Century Ave.) to serve the townhomes. These utilities have capacity and pressure adequate to meet the needs of the development. The project will drain to the Metropolitan Council treatment facility in Saint Paul.

Stormwater runoff from projects within the City of Maplewood will ultimately drain into the Mississippi River. The federal, state, and local stormwater regulations for development projects combined with the implementation of BMPs to control erosion and sedimentation during construction are anticipated to minimize cumulative effects of pre- and post-development runoff into downstream surface waters.

The effects on traffic and transportation for this project include three entry points to the site: one on Century Ave. S, one on lower Afton Rd, and one Linwood Ave E. These changes will allow access to the site, while having no significant impact on traffic flow of the surrounding area. The City of Maplewood has the capacity to support the public infrastructure needed to support this project; therefore, cumulative effects on public infrastructure are not anticipated.

The cumulative effects of suburban development can affect natural resources such as groundwater and waterbodies. It can also result in loss of wetlands and fragmentation of wildlife habitat. Eight wetlands were delineated in November 2023. The project will preserve the natural wetlands on site and enhance the buffer surrounding them. In addition, the open enhancement area will provide a large contiguous habitat corridor that provides additional protection to wetlands on site. Therefore, it is unlikely that significant changes to existing natural habitat will occur as a result of the development.

### C. Extent to Which Environmental Effects are Subject to Mitigation

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Minnesota Rule 4410.1700, Subp 7 (C) indicates that a third factor the City must consider is the “extent to which environmental effects are subject to mitigation by ongoing public regulatory authority.” The City’s findings are described in Table 7 below.

Environmental effects on water quality, wetlands, and traffic are subject to additional approvals and/or mitigation through requirements of local, state, and federal regulations, ordinances, management plans, and permitting processes. Potential environmental effects associated with this project will be mitigated in accordance with applicable rules and regulations. The following permits and approvals are required for the project addressed under the EAW.

**Table 7 (in the EAW). Required Permits and Approvals for the Proposed Project**

Unit of Government	Types of Application	Status
<b>Federal</b>		
U.S. Army Corps of Engineers (USACE)	Clean Water Act Section 404 Permit Approved Jurisdictional Determination	To be submitted
<b>State</b>		
Minnesota Department of Health (MDH)	Watermain Extension Permit	To be submitted
Minnesota Department of Natural Resources (MN DNR)	Water Appropriation Permit (Construction Dewatering) Incidental Take Permit	To be submitted, if necessary To be submitted, if necessary
Minnesota Pollution Control Agency (MPCA)	National Pollution Discharge Elimination System (NPDES)/State Disposal System (SDS) General Permit	To be submitted
Minnesota Pollution Control Agency (MPCA)	Sanitary Sewer Extension Approval Section 401 Water Quality Certification or Waiver 10-day Demolition Notification	To be submitted To be submitted, if necessary If needed
Metropolitan Council	Sewer Permit	To be submitted
<b>Local</b>		
City of Maplewood	Stormwater Management Plan Erosion and Sediment Control Plan Comprehensive Plan Amendment Rezoning Preliminary Plat Final Plat Approval General Development Plan Grading Permit Building Permit	To be submitted To be submitted Submitted Submitted Submitted To be submitted To be submitted To be submitted To be submitted
Ramsey County	Right-of-Way Permit Access Permit (s)	To be submitted To be submitted
Washington County	Right-of-Way Permit	To be submitted
Ramsey-Washington Metro Watershed District	Watershed District Permit	To be submitted
Ramsey-Washington Metro Watershed District	Wetland Boundary/Type Approval	Approved

#### D. Extent to Which Environmental Effects can be Anticipated and Controlled

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Minnesota Rules 4410.1700, Subp 7 (D) indicates the final factor the City must consider is the “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, including other EISs.” The City’s findings are set forth below.

1. The proposed project design, plans, EAW, related studies, and mitigation measures apply knowledge, approaches, standards, and best management practices gained from previous experience and projects that have, in general, successfully mitigated potential offsite environmental effects.
2. The EAW, in conjunction with this document, contains or references the known studies that provide information or guidance regarding environmental effects that can be anticipated and controlled.
3. Other project studies under environmental reviews in Minnesota have included studies and mitigation measures comparable to those included in this EAW.
4. There are no elements of the project that pose the potential for significant environmental effects that cannot be addressed by the project design, assessment, permitting, and development processes, and by ensuring conformance with regional and local plans.
5. The environmental effects of this development can be anticipated and controlled by the permit application and review processes of the City of Maplewood, Ramsey Washington Watershed District and regulatory agencies.
6. The City of Maplewood finds that the environmental effects of the project can be adequately anticipated and controlled given the results of the environmental review and permitting process.

## E. RECORD OF DECISION

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Based on the EAW, the response to comments, and the Findings of Fact, the City of Maplewood, the RGU for this environmental review, concludes the following:

1. The EAW was prepared in compliance with the procedures of the Minnesota Environmental Policy Act and Minnesota Rules, Parts 4410.1000 to 4410.1700 (2015);
2. The EAW satisfactorily addressed the issues for which existing information could have been reasonably obtained;
3. Based on the criteria established in Minnesota Rules 4410.1700, the project does not have the potential for significant environmental effects;
4. The City makes a “Negative Declaration,” and
5. **An EIS is not required.**

# Appendix A

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AGENCY AND PUBLIC COMMENTS SUBMITTED TO  
THE CITY OF MAPLEWOOD





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**Re: Century Ponds EAW**

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**From** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Date** Thu 7/3/2025 2:57 PM  
**To** Muhic, P Cameron (DOT) <cameron.muhic@state.mn.us>

Thank you for the email.

---

**From:** Muhic, P Cameron (DOT) <cameron.muhic@state.mn.us>  
**Sent:** Thursday, July 3, 2025 2:52:58 PM  
**To:** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Subject:** Century Ponds EAW

**External message alert:** This message originated from outside the City of Maplewood email system.  
**Use caution** when clicking hyperlinks, downloading pictures or opening attachments.

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Good afternoon Mr. Martin,

Thank you for the opportunity to review the EAW for **Century Ponds**. The Minnesota Department of Transportation (MnDOT) has reviewed the EAW and has no comments, as the proposed project should have little or no impact on MnDOT's highway system.

Cordially,

Cameron Muhic  
Principal Planner  
MnDOT Metro District  
651-234-7797  
[Cameron.Muhic@state.mn.us](mailto:Cameron.Muhic@state.mn.us)



Marshall Office | 504 Fairgrounds Road | Suite 200 | Marshall, MN 56258-1688 | 507-537-7146  
800-657-3864 | Use your preferred relay service | [info.pca@state.mn.us](mailto:info.pca@state.mn.us) | Equal Opportunity Employer

July 21, 2025

VIA EMAIL

Michael Martin  
City of Maplewood  
1830 County Road 8  
Maplewood, Minnesota 55109  
[michael.martin@maplewoodmn.gov](mailto:michael.martin@maplewoodmn.gov)

RE: Century Ponds – Environmental Assessment Worksheet

Dear Michael Martin:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Century Ponds project (Project) located in Ramsey County, Minnesota. The Project consists of a low-density development consisting of single-family homes and townhomes on a 92.25-acre former golf course in the City of Maplewood, Ramsey County, Minnesota. It is located in the southwest quadrant of Lower Afton Road East (CSAH 39) and Century Avenue South (CSAH 25) and will include internal roads and connection to municipal utilities. Regarding matters for which the Minnesota Pollution Control (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

#### Wastewater

- Section 12.b.i.1. states that the Project is expected to add approximately 145 pounds per day to the sanitary sewer which equates to approximately 17 gallons per day. These values should be clarified. Projects served by Metropolitan Council Environmental Services (MCES) typically use 274 gallons per day (gpd) per home for planning purposes. With 207 homes that would result in an average daily design flow of 56,718 gpd.
- This section also mentions that other improvements are needed to the sanitary sewer system that the Project will connect to. More details about those improvements necessary for the Project should be provided. A location map showing the sewer route to the wastewater treatment plant and where improvements are needed should be provided.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Project Proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW, please contact me by email at [chris.green@state.mn.us](mailto:chris.green@state.mn.us) or by telephone at 507-476-4258.

Michael Martin  
Page 2  
July 21, 2025

Sincerely,

*Chris Green*

*This document has been electronically signed.*

Chris Green, Project Manager  
Environmental Review Unit  
Resource Management and Assistance Division

CG:rs

Attachment

cc: Dan Card, MPCA (w/ attachment)  
Melinda Neville, MPCA (w/ attachment)  
Nicole Peterson, MPCA (w/ attachment)  
Colin Boysen, MPCA (w/ attachment)  
Lauren Dickerson, MPCA (w/ attachment)  
Deepa deAlwis, MPCA (w/ attachment)  
Innocent Eyoh, MPCA (w/ attachment)  
Julie Henderson, MPCA (w/ attachment)  
David Sahli, MPCA (w/ attachment)



July 30, 2025

Michael Martin, Assistant Community Development Director  
City of Maplewood  
1830 County Road B  
Maplewood, MN 55109

**RE: City of Maplewood – Environmental Assessment Worksheet (EAW) – Century Ponds**  
Metropolitan Council Review No. 23104-1  
Metropolitan Council District No. 12

Dear Michael Martin:

The Metropolitan Council received the EAW for the Century Ponds project in Maplewood on July 1, 2025. The proposed project is located in the southwest quadrant of Lower Afton Road East and Century Avenue South, on the site formerly known as The Ponds at Battle Creek Golf Course. The proposed development consists of 92.25 acres of single-family homes and townhomes.

The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes.

We offer the following comments for your consideration.

**Item 7: Climate** (*Shawn James, CD 651-602-1233*)

The discussion of anticipated climate trends is adequate. In addition to native plants, the project proposer should consider climate adapted vegetation to better withstand and mitigate the impacts of drought and large rain events. In Table 5, Land Cover of the Project Site Before and After Proposed Development, 39 acres of “Residential” are identified in the “After” column. Met Council staff notes that “Residential” is a land use and not a land cover. Council staff recommend showing the 39 acres of “Residential” as either “Impervious surface” or “Lawn/landscaping” to better reflect the changing conditions and climate adaptation and resilience impacts.

**Item 10: Land Use – Comprehensive Plan** (*Patrick Boylan, CD 651-602-1438*)

The City will need to amend the 2040 future land use map so the adopted 2040 Plan is consistent with the proposed development. The proposal includes 239 new homes in a mix of detached single family and townhomes. The site is currently guided Park; and to develop as proposed, a residential designation is needed.

**Item 10: Land Use – Forecasts** (*Todd Graham, Research 651-602-1322*)

This expected development fits within the current 2040 and 2050 forecast for the community. The City may consider requesting a forecast adjustment if the proposed development will be built and absorbed before the 2030 Census; please contact Met Council Community Development staff to discuss.

**Item 12: Water Resources - Sanitary Sewers** (Roger Janzig, ES [roger.janzig@metc.state.mn.us](mailto:roger.janzig@metc.state.mn.us))

The Metropolitan Disposal System has adequate capacity for this project location.

Based on the wastewater information provided in the EAW, the site is proposed to be served either northwest to an existing stub at MH18 along regional interceptor 1-MW-410 or a portion to the northwest and a portion to the southeast to an existing local Woodbury sewer. A direct connect permit is required for the northwest connection to the existing stub on 1-MW-410. Contact Tim Wedin, Interceptor Engineering at the Metropolitan Council Environmental Services (651-602-4571) ([Timothy.Wedin@metc.state.mn.us](mailto:Timothy.Wedin@metc.state.mn.us)) regarding this connection.

Service to the southeast through Woodbury's local system represents unmetered flow from Maplewood to Woodbury, with the flow eventually being captured at Woodbury's billing meter, M018. An intercommunity agreement with Woodbury to determine how wastewater billing will be handled is required. There are existing agreements in place between the two cities. One of those agreements is for the Century Avenue sewer and could potentially be updated to include the proposed new service area. An MPCA sanitary sewer extension permit is also required, which includes Metropolitan Council review and approval. Please reach out to David Sahli at MPCA (651-757-2687) ([David.Sahli@pca.state.mn.us](mailto:David.Sahli@pca.state.mn.us)) regarding the MPCA sanitary sewer extension permit.

An amendment to the adopted 2040 Plan is required before review of the MPCA sanitary sewer extension permit application and Metropolitan Council direct connect permit application can be completed.

**Item 12: Water Resources – Water Supply** (Lanya Ross, ES 651-602-1803)

Development and redevelopment, particularly at the scale of this proposal, provide several opportunities to incorporate practices that improve water efficiency and protect water quality. As more site-specific plans are developed, Council staff encourages the City to identify risks to water quality and incorporate mitigation strategies that protect surface water and groundwater resources. We also encourage the City to identify and implement opportunities for water conservation and efficiency, to minimize any increases in water demand.

**Item 18: Greenhouse Gas Emissions** (Shawn James, CD 651-602-1233)

The anticipated greenhouse gas emissions are reasonable and the proposed mitigation measures are appropriate. The proposer should consider use of energy conservation planting strategies, such as vegetation that provides shade to east and west-facing windows while avoiding shade to south-facing windows to maximize solar exposure during the winter and minimize solar exposure in the summer.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Patrick Boylan, Principal Reviewer, at 651-602-1438 or via email at [patrick.boylan@metc.state.mn.us](mailto:patrick.boylan@metc.state.mn.us).

Sincerely,



Angela R. Torres, AICP, Senior Manager  
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division  
Mark Jenkins, Metropolitan Council District 12  
Chai Lee, Metropolitan Council District 13  
Patrick Boylan, Sector Representative/Principal Reviewer  
Reviews Coordinator

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**Century Ponds EAW - DNR Comments**

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**From** Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>  
**Date** Thu 7/31/2025 4:19 PM  
**To** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Cc** Michael Suel <msuel@drhorton.com>

**External message alert:** This message originated from outside the City of Maplewood email system. **Use caution** when clicking hyperlinks, downloading pictures or opening attachments.

Dear Michael Martin,

Thank you for the opportunity to review the Century Ponds Environmental Assessment Worksheet for the project located in Ramsey County. The DNR appreciates that native seed mixes will be utilized within the development, especially because the project area is located within a High Potential Zone for the federally-endangered rusty patched bumble bee. Please note that further coordination with DNR is required regarding the state-threatened Sullivant's milkweed that has been found on site. The proposer should contact [reports.nhis@state.mn.us](mailto:reports.nhis@state.mn.us) with further information about the location and number of individuals present in order to discuss approved avoidance measures and/or the need for a Permit to Take.

Thank you,

**Melissa Collins**

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her/hers

**Minnesota Department of Natural Resources**

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: [melissa.collins@state.mn.us](mailto:melissa.collins@state.mn.us)

[mndnr.gov](http://mndnr.gov)





Mr. Michael Martin  
 City of Maplewood  
 Assistant Community Development Director

Re: Century Ponds EAW

Ramsey-Washington Metro Watershed District (RWMWD) has two regulatory roles in the review and permitting of the proposed development. First, RWMWD is the Local Government Unit (LGU) responsible for implementation of the Minnesota Wetland Conservation Act (WCA) for this area of Maplewood, with collaboration and oversight from the MN Board of Water & Soil Resources (BWSR), MN Department of Natural Resources (DNR), and Ramsey County. Second, RWMWD has adopted watershed district rules for land-disturbing activity within its jurisdictional area.

The RWMWD rules at a local watershed level regulate things like stormwater management, flood control, wetland management, and erosion and sediment control. A preliminary permit application submittal was received by RWMWD on 2/10/25 with comments provided to the permit applicant on 2/17/25. RWMWD staff, in collaboration with the watershed district's engineering consultant Barr Engineering, will review a future revised application when it has been submitted by the developer and provide updated comments within the context of the watershed district's rules. Following the review process, staff will provide a recommendation to the RWMWD Board of Managers, who are ultimately responsible for approving or denying grading permit requests for the purposes of land-disturbance and construction activities.

RWMWD staff appreciate the opportunity to submit additional comments/feedback on the following for consideration:

- Section 7 (Table 4) of the EAW describes climate adaptation strategies, including a statement that "98% of the site will be enhanced open/natural area," however the current site plan shows less than 98% open/natural space under proposed conditions.
- Section 7 (Table 4) of the EAW states there is "low risk" for contamination as a result of the project. Is there any evidence of existing soil or water contamination from previous land uses? What level of geotechnical investigation has been completed for any potential existing contamination that may be disturbed through proposed grading and/or excavation activities?
- Section 10.a.iii states that the "nearest floodplain is approximately one mile north of the project site," however RWMWD regulates all areas modeled to be inundated in the 100-year rainfall event as floodplain. Per comments provided to the applicant in Feb 2025, the project design will need to include cut/fill volumes below the 100-year water surface elevation in each wetland and floodplain area based on the RWMWD stormwater model to demonstrate RWMWD Rule D requirements are met.

- Section 11 of the EAW states that approximately “300,000 cubic yards of soil movement” is expected during the project. RWMWD recommends disturbance of the site in phases to more effectively implement the erosion and sediment control plan and Stormwater Pollution Prevention Plan (SWPPP).
- Section 12.b.ii of the EAW indicates that “most runoff will remain onsite by traveling to the wetlands or into the constructed stormwater ponds.” RWMWD Rule C requires that stormwater runoff directed to wetland areas is pretreated. Due to the acreage proposed to be disturbed, temporary sediment ponds will be required per the state’s NPDES permit requirements and RWMWD Rule F.
- Section 21.c of the EAW references an incorrect infiltration requirement. Per the watershed district’s rules, 1.1” of runoff from impervious surfaces is required to be captured and infiltrated onsite. Where infiltration is not feasible due to poor soils, additional volume is required to be captured and filtered in accordance with RWMWD Rule C.
- Based on findings from Section 14 of the EAW, care should be taken to preserve habitat and protect species that are endangered, threatened, or of special concern, including Henslow’s sparrow, Sullivant’s milkweed, Northern long-eared bat, monarch butterfly, and Rusty patched bumble bee. If the proposed development is approved, RWMWD implements grant funding for water quality practices and native habitat restoration. Coordination on any additional water quality or habitat improvements could be made with RWMWD staff, however the project must first demonstrate meeting the minimum permit requirements.

Thank you,

Nicole Maras  
Ramsey-Washington Metro Watershed District  
Regulatory Program Manager



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**Re: DR Horton South Maplewood project**

---

**From** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Date** Tue 7/8/2025 4:18 PM  
**To** Stuart Bestland <stu.bestland@icloud.com>  
**Cc** Stu stu.bestland@yahoo.com <stu.bestland@yahoo.com>; Chonburi Lee <chonburi.lee@maplewoodmn.gov>

Hello,

Thank you for sending in your comments. They have been received.

---

**From:** Stuart Bestland <stu.bestland@icloud.com>  
**Sent:** Tuesday, July 8, 2025 2:18 PM  
**To:** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Cc:** Stu stu.bestland@yahoo.com <stu.bestland@yahoo.com>; Chonburi Lee <chonburi.lee@maplewoodmn.gov>  
**Subject:** DR Horton South Maplewood project

[You don't often get email from stu.bestland@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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Hello Mr. Martin,

DR Horton has a history of hiring illegal aliens for their construction work sites.

What assurances and compliance verification processes are in place to insure that illegal immigrants are not being employed at this job site? Whether they are being hired directly or by a subcontractor.

Thank you,

Stuart Bestland  
South Maplewood resident



Outlook

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## EAW Response

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**From** Hager, Michael <Michael.Hager@andersencorp.com>

**Date** Wed 7/30/2025 11:19 AM

**To** Michael A. Martin <michael.martin@maplewoodmn.gov>

You don't often get email from michael.hager@andersencorp.com. [Learn why this is important](#)

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Dear Michael,

The neighbors on Linwood Ave have the following concerns regarding the recent EAW study related to the DR Horton development proposal and we have summarized our concerns below:

1. Environment – regardless of DR Horton’s assertion the animals and environment would not be impacted in any meaningful way it is incompressible given the number of single-family homes and townhouses of that magnitude including roads to carry the additional traffic will impact the following:
  1. Impact to endangered/threatened species - Rusty Patched Bumble Bee, Northern Long Eared Bat and Monarch butterflies
  2. Protection of animals including turkeys, deer and coyotes
  3. Increase of noise and light pollution from new homes and townhouses, streetlights and increased vehicle traffic
  4. Negative impact of run-off caused by fertilizer, gas, oil and rainwater in such a small area
2. Safety – this DR Horton development will increase the overall risk of those living in the existing neighborhood in the following ways:
  1. Increased vehicle traffic. The city has already acknowledged the frequency of cars driving on Linwood Ave at excessive speeds. Adding additional single-family homes and townhouses will increase the traffic on Linwood Ave and will further exacerbate an already unsafe road for neighbors driving and walking on Linwood Ave
  2. There are currently no sidewalks on Linwood Ave on either side of the street and with the new DR Horton development there are no proposed sidewalks to ensure the safety of people walking on Linwood Ave even though vehicle traffic will increase
3. If a stop sign is added in front of any of the homes on Linwood Ave it will increase the risk of getting into an accident and additional traffic congestion for the current neighbors
4. It seems that the existing homes/neighbors along Linwood Ave are bearing the brunt of additional traffic which also increases the risk to our safety
5. As I have mentioned multiple times at the DR Horton public meetings the park/walking path requested by the City Council of DR Horton be placed closest to Linwood Ave to create space next to Linwood Ave and provide a buffer for the existing homes on Linwood Ave. It would also make it easier for the general public to access the park and not have it hidden deep into the new development which will likely only be used by the people in the DR Horton development
6. It seems unbalanced the proposed townhouses with the smallest lot size is right across from the existing homes on Linwood Ave that have 1+ acre lots. This will negatively impact property values of the existing homes on Linwood Ave
7. A buffer/set back should be added to the plan to minimize noise and light pollution from those already living on Linwood Ave. This was added to the most recent DR Horton proposal for the West side of the development. Why isn't there a similar buffer created for the existing residents of Linwood Ave? Again, we

feel we are bearing the brunt of the burden of the DR Horton development compared to other surrounding/existing neighborhoods

- 8. We are requesting a minimum 6-foot berm and vegetation be added to the DR Horton development on the Linwood Ave side to minimize noise and visual pollution to the existing homes on Linwood Ave
- 9. What is the plan for city water and sewer for the existing homes on Linwood Ave? Is this something that can be discussed with the current residents?

We wholeheartedly agree with the Maplewood Mayor and City Council that this land is a "jewel" and should be developed as such. We as a community have one opportunity to get this right and hope you take whatever time is needed to find the best overall solution for the city of Maplewood and its current residents. We would appreciate you taking into account our concerns and request additional development proposals from DR Horton so it can be a win for Maplewood and its existing residents. We know that finding balance with existing neighbors and development companies (e.g. DR Horton) is not always easy, but as your constituents we hope that we, as established residents of Maplewood, would receive the benefit of the doubt on key issues to minimize the negative impact to us in the future. We want to be able to share with our neighbors and friends what a great job the Maplewood Mayor and City Council performed in their support of the neighbors during the DR Horton development project.

If you have any questions you can contact any of us at the email below next to our names.

Thank you!

Michael Hager	2670 Linwood Ave E, Maplewood	<a href="mailto:mhager@centurylink.net">mhager@centurylink.net</a>
Debbie Hager	2670 Linwood Ave E, Maplewood	<a href="mailto:dkhager@centurylink.net">dkhager@centurylink.net</a>
Nicholas Hager	2680 Linwood Ave E, Maplewood	<a href="mailto:nicholasmhager@gmail.com">nicholasmhager@gmail.com</a>
William Hager	2680 Linwood Ave E, Maplewood	<a href="mailto:mcdo0448@gmail.com">mcdo0448@gmail.com</a>
Kim Johnson	2660 Linwood Ave E, Maplewood	<a href="mailto:kej1551@gmail.com">kej1551@gmail.com</a>
Dorothy Johnson	2660 Linwood Ave E, Maplewood	<a href="mailto:dorothyj4410@gmail.com">dorothyj4410@gmail.com</a>

Mike Hager  
 Pronouns – He/They  
 Work 651-264-6155  
 Mobile 651-955-9520  
[Michael.hager@andersencorp.com](mailto:Michael.hager@andersencorp.com)

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**Re: Public Comment on Century Ponds EAW – A Call for Resilient, Human-Scaled Development**

---

**From** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Date** Wed 7/30/2025 8:51 AM  
**To** MaplehoodUnited <maplehoodunited@gmail.com>  
**Cc** Marylee Abrams <marylee.abrams@maplewoodmn.gov>; Kathleen Juenemann <kathy.juenemann@maplewoodmn.gov>; Chonburi Lee <chonburi.lee@maplewoodmn.gov>; Rebecca Cave <rebecca.cave@maplewoodmn.gov>; Nikki Villavicencio <nikki.villavicencio@maplewoodmn.gov>; Kelly.Miller@co.ramsey.mn.us <Kelly.Miller@co.ramsey.mn.us>  
**Bcc** Michael Sable <michael.sable@maplewoodmn.gov>; Danette Parr <danette.parr@maplewoodmn.gov>

Hello,

Thank you for submitting your comments on the EAW. They have been recorded.

---

**From:** MaplehoodUnited <maplehoodunited@gmail.com>  
**Sent:** Wednesday, July 30, 2025 8:00 AM  
**To:** Michael A. Martin <michael.martin@maplewoodmn.gov>  
**Cc:** Marylee Abrams <marylee.abrams@maplewoodmn.gov>; Kathleen Juenemann <kathy.juenemann@maplewoodmn.gov>; Chonburi Lee <chonburi.lee@maplewoodmn.gov>; Rebecca Cave <rebecca.cave@maplewoodmn.gov>; Nikki Villavicencio <nikki.villavicencio@maplewoodmn.gov>; Kelly.Miller@co.ramsey.mn.us <Kelly.Miller@co.ramsey.mn.us>  
**Subject:** Public Comment on Century Ponds EAW – A Call for Resilient, Human-Scaled Development

Some people who received this message don't often get email from maplehoodunited@gmail.com. [Learn why this is important](#)

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Dear Development Director Martin and Members of the Maplewood City Council,  
I'm writing to submit a public comment in response to the Environmental Assessment Worksheet (EAW) for the proposed [Century Ponds | Maplewood, MN](#) redevelopment project.

As a resident and regional stakeholder who cares deeply about the long-term prosperity and sustainability of our metro area, I urge the City of Maplewood to take a broader, more thoughtful, fiscally resilient, and future-oriented approach to this key site.

### **A Rare Opportunity – Don't Waste It**

Century Ponds is not a greenfield in the exurbs—it's a 92-acre former golf course inside the 494 loop, walking distance from a major hospital, transit routes, shopping, and jobs. It is a once-in-a-generation opportunity to build a neighborhood that actually reflects the human-scale character and dynamism of great places.

But instead of seizing that opportunity, the current proposal carves up the site for low-density single-family homes—duplicating a suburban model that’s already proven fiscally unsustainable. This is not just a missed opportunity; it is a liability Maplewood cannot afford.

### **This Development Won’t Pay for Itself**

From a *Strong Towns* perspective, the problem isn’t density for density’s sake—it’s that spread-out, low-intensity developments like this simply don’t generate enough long-term tax revenue to cover the future costs of infrastructure maintenance. This has been proven across the country, and we’re seeing it locally too—roads deteriorate, city budgets tighten, and it’s residents who eventually pay the price. Let’s not pretend that stretching pipes and pavement across 100 acres of sparse development is “green” or fiscally wise. The very idea that this project is “preserving green space” by capping density is backward: when we fail to build homes near jobs, services, and transit, we push new growth outward—where it *does* destroy woods, wetlands, and farmland.

### **We Need More Than Single-Family Homes**

I’m not opposed to housing here. In fact, I want to see more! But I urge the city to allow a broader, more inclusive range of housing types: duplexes, townhomes, small-scale multifamily, cottage courts. A more dynamic mix would allow the site to serve young families, seniors looking to downsize, essential workers at nearby hospitals, and people priced out of neighboring cities.

This is how resilient towns grow—*incrementally, affordably, and for everyone.*

The nearby Woodwinds Hospital, Gold Line BRT, and access to both I-494 and Highway 10 make this site ideal for the type of **compact, connected, and complete neighborhood** the region desperately needs. We shouldn’t settle for outdated zoning assumptions that pretend anything more than a single-family home is “too dense” for the area with (2.3 units per acre)—especially when hundreds of apartments already exist *across the street* in Woodbury and Maplewood approved a denser plan for the 20 years ago for the award winning [New Century Housing Development](#) just to the south with 162 units on 57 acres (3 units per acre). That’s 30% more density in the city previously approved in a less desirable location than the Century Ponds Site!

### **Let’s Build a Neighborhood, Not a Subdivision**

This could be more than a tax-revenue band-aid—it could be a beautiful, people-oriented neighborhood with walkable streets, parks, a range of housing options, and small-scale civic or commercial spaces. Maplewood deserves better than another cul-de-sac cluster surrounded by drive lanes and runoff.

Please don’t let the EAW be the end of public input. I urge the city to reimagine this project through the lens of its 2040 plan, long-term fiscal health, social inclusion, and climate resilience. Consider forming a design task force or using a charrette process to explore alternative site plans that reflect *Strong Towns* values and community engagement.

Thank you for the opportunity to comment. I appreciate the city’s commitment to public dialogue and hope you’ll see this project as the bold opportunity it is.

**Respectfully,**

Oliver of Gladstone  
[maplehoodunited@gmail.com](mailto:maplehoodunited@gmail.com)

**Ponds EAW Comments from Friends of Maplewood Nature – 7-30-25**

To:

Michael Martin

Assistant Community Development Director | City of Maplewood

1830 County Road B E

Maplewood, MN 55109

[Michael.Martin@MaplewoodMN.gov](mailto:Michael.Martin@MaplewoodMN.gov)

Thank you for the opportunity to comment on the draft EAW for Century Ponds.

The Friends of Maplewood Nature appreciates that DR Horton and their consultants met with us and other environmental advocates on October 24, 2024 to discuss environmental issues. And we appreciate that the draft EAW addresses many of the issues that we raised, particularly in the following quote from the EAW page 31:

In addition to the (DNR) guidelines outlined above, the project proposer has identified measures to avoid, minimize, and mitigate impacts to protected species found on site.

- Rusty patched bumble bee and monarch butterfly: The development will include 21 acres of enhancement areas throughout the site. These areas will be seeded with native seed mix and provide a larger contiguous area of native foraging habitat for wildlife and pollinator species. The site will minimize the use of herbicides throughout these native planting areas and avoid the application of insecticides and fungicides.

- The USFWS has been contacted throughout the planning stages of this project. The USFWS has stated that since the project does not have a federal nexus, the project proposer is not federally subject to the Endangered Species Act requirements. The USFWS is aware that the rusty patched bumble bee has been seen on the site and recommended that voluntary foraging enhancement on the site could help mitigate potential impacts to pollinator species. Additionally, though the rusty patched bumble bee is not a MN DNR protected species, the MN DNR did recommend reseeding disturbed soils with native species of grasses and forbs using BWSR Seed Mixes and MnDOT Seed Mixes. As stated above, the project is committed to enhancing a large contiguous area of native habitat to provide an abundance of foraging and nesting habitat for pollinator and wildlife species.

Plant species of special concern:

- 8 swamp white oaks will be removed and 4 swamp white oaks will be preserved. The proposed project intends to plant an additional 20 swamp white oaks throughout the property.

- One Kentucky coffee tree was documented on the project site and will remain undisturbed.
- White wild indigo, rattlesnake master, and creeping juniper are present in the sporadic native plantings on site. Impacts to some of these sporadic plantings will occur; however, other native plantings will be preserved and included in a larger contiguous native planting area.
- Impacts to natural wetlands and their surrounding buffers will be avoided. The wetland buffers will be enhanced with native vegetation.
- Any slopes requiring erosion control blanket will use biodegradable fabrics (natural netting) to mitigate impacts to wildlife.
- Trees that will be cleared during construction will be replaced throughout the site per the City's tree ordinance.

However, the EAW does not acknowledge all of the Rusty patched bumble bee observations at this site:

- Page 28 – 29 mention a “sighting in July 2024 in the northwestern pond area.” Actually, there were two widely separated sightings, one in the northwestern pond area and a second in the south central area, both verified on Bumble Bee Watch:
  - <https://www.bumblebeewatch.org/sightings/bee/193402/>
  - <https://www.bumblebeewatch.org/sightings/bee/195777/>
- The ecological survey in the EAW, Appendix E, pages 3 and 6, does not acknowledge either of the above 2024 sightings.

Perhaps this is not the role of an EAW, but we ask the city and DR Horton to describe how the above environmental mitigation steps will be monitored and maintained in both the short and long term. We look forward to working with the city and DR Horton regarding issues such as:

- Conservation easements
- Ownership of natural areas
- Delineation of responsibility and funding for maintenance of natural areas
- Public access
- Short and long term plans for maintenance and preservation of natural areas
- Education and encouragement for homeowners and the HOA to provide natural habitat in yards and other private areas in the development

John Zakelj, President

Friends of Maplewood Nature

July 31, 2025

Michael Martin  
Assistant Community Development Director  
City of Maplewood  
1830 County Road B E  
Maplewood, MN 55109

Harj (Hello), Mr. Martin:

I am submitting my comments on DR Horton's EAW for the Century Ponds proposed housing development. I live around the corner from this site and have serious concerns about the impact this proposed development will have, especially on our plant and animal relatives. I am a Dakota winyan (woman) and a former Tribal president for Tinta Wita (Prairie Island Indian Community). As a Dakota, I have a different worldview. I see the plants, animals, water as relatives just as us 2-leggeds are.

I am alarmed at the flippant attitude towards our plant and animal relatives on this site. The milkweed is used as food in a soup and the #1 food source for butterflies and bees. The white wild indigo is used in cooking. The Kentucky coffee tree is used in medicine, particularly to relieve constipation. The juniper is used in ceremonies and the berries are a food medicine for us. The white oak is a food source for us and animals. It is also a part of our ceremonial stories.

The bats, whooping cranes, monarch butterfly, and rusty patched bumble bee are all reliant on these plants. It is a whole eco-system that relies on one another. To say that the bats, cranes, butterflies, and bees "would likely be deterred" and "mobilize to other suitable habitats in the surrounding area" or "will likely disperse to adjacent and/or similar habitats" is so out of touch and disrespectful to these relatives as well as to those of us who love and enjoy them. We are constantly losing natural spaces around here and to continually say they can just go somewhere else is wrong!

I also have concerns that DR Horton does not seem apt to do a Phase I archeological survey simply because it is not required. The area around us from this site to Wakan Tipi and Wicañapi Regional Park have great significance to the Dakota people. I strongly suggest you require DR Horton to do the Phase I archeological survey. They would work with Minnesota Indian Affairs Council and should also work with Prairie Island's THPO on this. As a Dakota person I am really tired of us being left out of these kinds of projects. We have a different relationship with the land than most and I feel we need to be more thoughtful in this process.

I'm not sure how they are funding this project but if there are any federal funding sources used or federal permits needed, they have to do a Section 106 review. I know the MnSHPO report spells this out but I wanted to reiterate it since there is a history in Minnesota of not taking this seriously. As a Tribal leader I had to deal with my fair share of disregard to us and our history.

If you have any questions or comments, do not hesitate to contact me at [shelcbuck@aol.com](mailto:shelcbuck@aol.com) or 651-271-1498.

Pidamayaye ye (thank you),

Shelley Buck  
748 Linden Cir S., Maplewood, MN 55119

# Appendix B

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CITY OF MAPLEWOOD RESOLUTION

FINDING OF NO NEED FOR EIS





## **August 25, 2025 City Council Meeting**

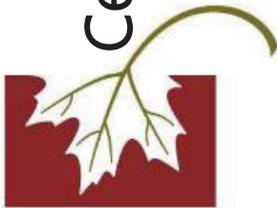
Overview of the Environmental Assessment Worksheet  
(EAW) for the Century Ponds Project at former Ponds at  
Battle Creek golf course



Maplewood

## Roles of RGU and Proposer

- **Project Proposer:** DR Horton
  - Initiated project and EAW
- **Project Proposer Consultant:**
  - Alliant prepared the EAW on behalf of the project proposer
- **RGU:** City of Maplewood
  - Responsible for preparation of the EAW
  - Reviews EAW to ensure completeness and adequacy
- **RGU Consultant:**
  - City retained Kimley-Horn to review the EAW on behalf of the City



# Maplewood

## Century Ponds Project

- Located on a 92.25-acre site that was a former golf course in the SW quadrant of Lower Afton Rd E (CSAH 39) and Century Ave S (CSAH 25)
- 207 total units
  - 134 single family homes
  - 73 townhome units
- Required EAW under Mn Rules Subp 19. Residential Development



**Century Ponds**

**Legend**



Study Area



Maplewood

## What is an EAW?

- An EAW is a document designed to lay out the basic facts of a project to determine if additional environmental review is required
- The EAW form consists of 22 questions and is published by the Environmental Quality Board (EQB)

## Purpose of an EAW

- Informs the public about the project
- Provides information on future permitting and approvals
- Helps identify potential impacts and mitigation strategies
- An EAW does not approve or deny a project
  - It is a source of information to guide other approvals and permitting decisions



Maplewood

## EAW Topics

- Climate Adaption
- Cover Types
- Land Use
- Geology/Soils
- Water Resources
  - Wetlands and Surface Waters
  - Stormwater
  - Water and Sewer Infrastructure
- Contamination and Hazardous Materials\*
- Habitat and Endangered Species\*
- Historic Properties
- Visual
- Greenhouse gas analysis
- Transportation\*
- Air and Noise
- Cumulative

*\* Additional studies for this EAW included: Phase I/II  
ESA, traffic study, ecological study*



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Climate Adaption and Resilience	Project design will incorporate energy efficient building materials, comply with the City's landscaping ordinance (adding 453 new trees), enhanced open space and green infrastructure.
Land Use	Comprehensive Plan amendment to re-guide the site to residential.
Geology/Soils	Apply Best Management Practices during and after construction to stabilize soils and prevent erosion and runoff.



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Water Resources - Wetlands	No impacts to Wetland Conservation Act (WCA) regulated wetlands anticipated.
Water Resources – Wastewater	Development will produce normal domestic wastewater and will be designed within the limitations of the existing sanitary sewer system.
Water Resources – Water Quality	Runoff will be pretreated in stormwater basins on site before draining into surrounding wetlands and stormwater runoff quality and quantity will be designed to meet agency requirements.
Water Resources – Water Appropriation	Development will connect to St. Paul Regional Water Services and is within capacity.



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Contamination	Waste material and debris associated with construction will be contained on site and disposed of in a manner consistent with State Laws and City of Maplewood Ordinances.
Protected Species	<ul style="list-style-type: none"><li>• Protective buffers will be created around preserved wetlands and open space will be reestablished with native vegetation/seed mixes and trees.</li><li>• Proposer will coordinate with the DNR about determining the appropriate avoidance measures and/or need for a Permit to Take Sullivant's milkweed, if applicable.</li></ul>



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Protected Species (cont'd)	<ul style="list-style-type: none"><li>• Henslow's sparrow suitable nesting habitat should be avoided during the breeding season between May 15 and July 15, per MnDNR guidance. If avoidance during the breeding season is not feasible, areas that will be disturbed that contain suitable nesting habitat will need to be surveyed for active nests.</li><li>• 4 of 8 swamp white oaks will be preserved, and proposer plans to plant 20 additional; and one Kentucky coffee tree will also be preserved.</li><li>• Where possible, native plantings will be preserved and included in a larger contiguous native planting area.</li><li>• Trees that will be cleared during construction will be replaced throughout the site per the City's tree ordinance.</li></ul>



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Historic Properties	State Historic Preservation Office review letter stated that due to the site's proximity to archaeological sites found off-site, a Phase I archaeological survey is recommended.
Visual	Landscape plantings will be included in the development per the City of Maplewood landscape ordinance.
Air	Short-term dust and odors impacts will be managed through proper coordination and construction planning.



Maplewood

## Impacts and Mitigation Summary

Resource Area	Mitigation Strategy
Greenhouse Gas (GHG)	Development will incorporate mitigation measures into the design and development of the project to reduce the project's GHG emissions.
Noise	Noise study recommended that windows on townhomes on the south side of the site, facing the gun range, be doubled paned to mitigate noise.
Transportation	Proposed development is expected to have minimal impact to the existing transportation system. Traffic impacts will be further analyzed during the City's preliminary plat review process.



Maplewood

## Comment Period Summary

- 30-day comment period from July 1-31, 2025
- 5 public comments
  - Themes: concerns about water, wildlife, traffic impacts from development, questions about sidewalks, vegetation, and wastewater connections to nearby residents
- 5 agency comments (MnDOT, MPCA, Met Council, MnDNR, RWMWD)
  - Themes: clarifying wastewater flows and improvements, acknowledging Comp Plan amendment process through Met Council, consideration of water quality and energy conservation strategies, coordination needed with MnDNR on the Sullivant's milkweed, question on soil contamination investigation status, ensuring developer follows RWMCD's requirements



Maplewood

## Does the Project Have Significant Environmental Effects?

The project does not have significant environmental effects, according to Minnesota Rules, part 4410.1700, subpart 7:

- A. Type, extent, and reversibility of environmental effects.
- B. Cumulative potential effects.
- C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.
- D. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.