



**Planning & Development Division**  
*Planning & Economic Development Department*

Room 160  
411 West First Street  
Duluth, Minnesota 55802

218-730-5580  
planning@duluthmn.gov

**TO:** Interested Parties (Including Minnesota Environmental Quality Board Distribution List)

**FROM:** Adam Fulton, Deputy Director, Department of Planning and Economic Development, City of Duluth

**DATE:** January 9, 2024

**SUBJECT:** Order for the Alternative Urban Areawide Review (AUAR) of the Central High School Redevelopment Project (PL 23-127)

Following redevelopment interest in the Central High School Redevelopment Site in summer 2023, the City of Duluth decided to conduct an Alternative Urban Areawide Review (AUAR) to plan for future development and to evaluate environmental impacts for the maximum potential buildout of the site. The City of Duluth is the Responsible Governmental Unit (RGU) and the Proposer for the AUAR.

This document constitutes an Order for the AUAR of the Central High School Redevelopment Project as shown in the Development Scenarios and related Tables and Figures below.

Enclosed is the Scoping Document for the proposed redevelopment. The Scoping Document was published December 5, 2023, for review and comment as part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a. A public hearing was held by the Planning Commission December 12, 2023.

All comments received on the Scoping Document by the January 4, 2024 deadline are attached in Appendix B with a summary of comments and responses to the comments in Appendix A. By approval of this order, comment responses are accepted and will be forwarded to commenters along with this Order.

## **AUAR Study Area**

The AUAR area encompasses approximately 80 acres on the site of the former Central High School near Central Entrance and H. Courtney Drive in the City of Duluth, St. Louis County, Minnesota (see Figure 1).

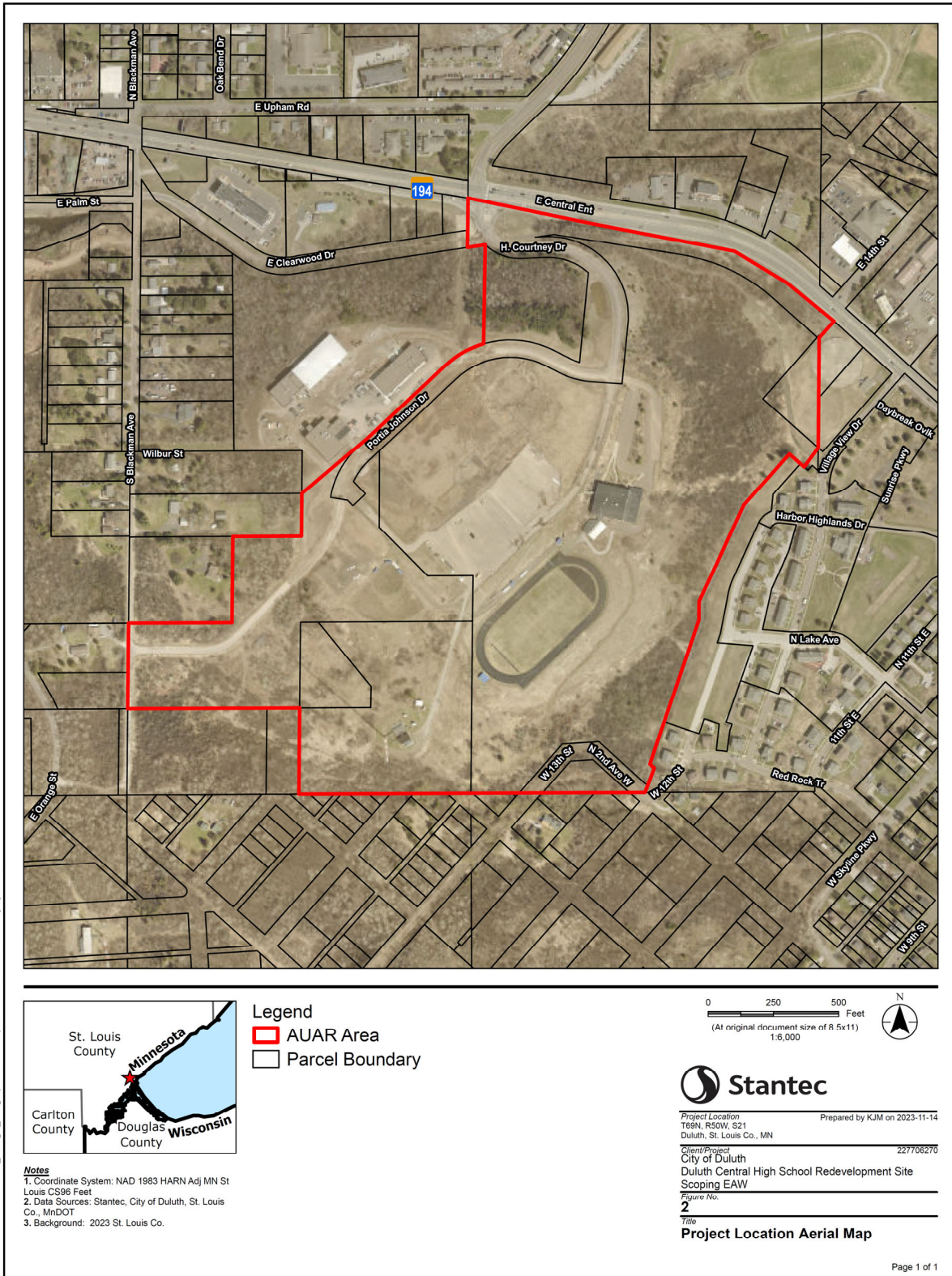
## **Development Scenarios**

Two development scenarios, defined in Table 1 and shown in Figures 2 and 3, are proposed to be evaluated in the AUAR. Scenario A represents a business park scenario consistent with the City's future land use map in its adopted Comprehensive Plan ([https://duluthmn.gov/media/rtgk5tin/imagine-duluth-2035-combined\\_website\\_temp.pdf](https://duluthmn.gov/media/rtgk5tin/imagine-duluth-2035-combined_website_temp.pdf)). Scenario B represents a mixed commercial and residential (mixed use) scenario that is intended to maximize development of the site to capture the full potential environmental impacts of future development.

**Table 1: AUAR Development Scenarios**

Description	Development Scenario A (Business Park)	Development Scenario B (Mixed Use)
Total Project Acreage	79.7	79.7
Linear project length	N/A	N/A
Number and type of residential units	N/A	1590 units of medium to high density housing (32 townhomes + 1558 apartments)
Residential building area (in square feet)	N/A	1,479,000
Commercial building area (in square feet)	N/A	124,000
Industrial building area (in square feet)	360,000	N/A
Institutional building area	N/A	N/A
Structure height(s)	1-story	7-story

Figure 1: AUAR Study Area

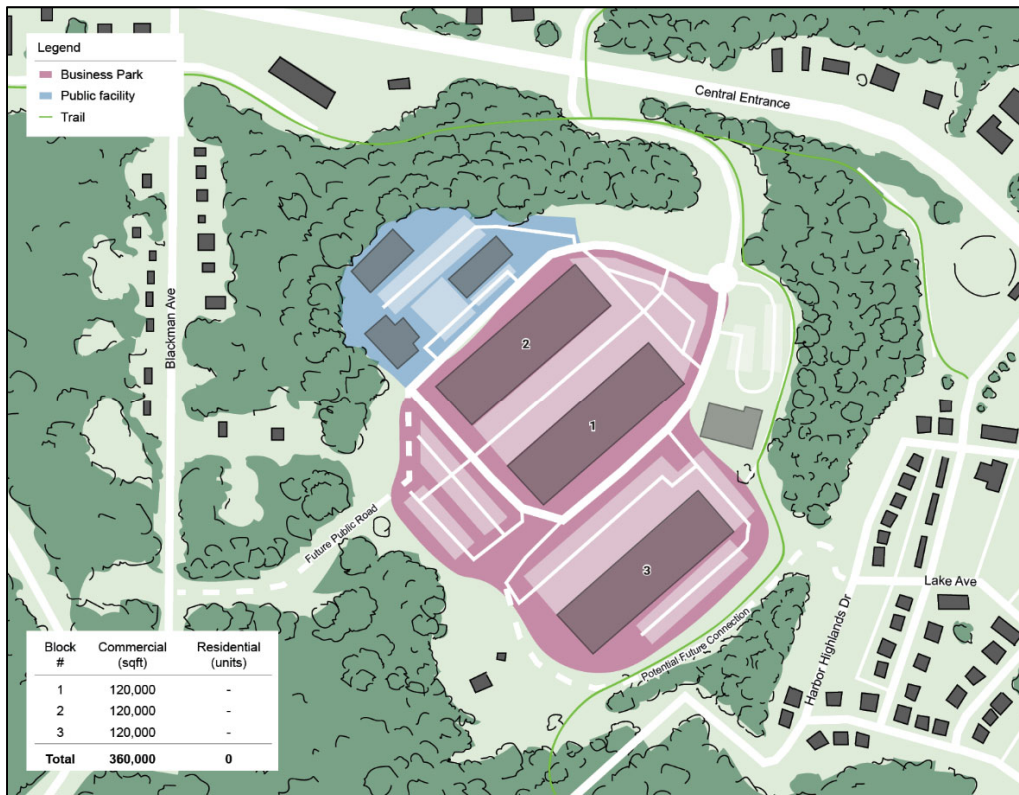


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**Figure 2: Scenario A – Business Park**



**Figure 3: Scenario B – Mixed Use**



## APPENDIX A – Response to Scoping EAW Comments

The Scoping Environmental Assessment Worksheet (EAW) for the Central High School Redevelopment Project Alternative Urban Areawide Review (Draft AUAR) was prepared and published for public comment in accordance with Minnesota Rules, part 4410.3610, Subpart 5a. The Scoping EAW was published on December 5, 2023, and distributed to the Environmental Quality Board (EQB) and persons and agencies on the official Environmental Quality Board (EQB) mailing list in accordance with EQB rules. Notices concerning the availability of the document and comment period were posted in the Duluth News Tribune on December 2, 6, and 9, 2023. The document was made available in the Duluth Public Library and on the City of Duluth web page. The Duluth City Planning Commission held a public hearing on December 12, 2023 where one citizen inquired about future options to comment on the two scenarios and related structure height (City staff replied that structure height would be considered and that a public hearing on the AUAR would be held by the Planning Commission in March, 2024). The Duluth News Tribune published a story announcing the start of the 30-day comment period and published an editorial board piece encouraging public participation in the Scoping EAW. The 30-day comment period expired on December 27, 2023.

The purpose of the Scoping EAW was to provide information, seek input on the proposed scope of analysis for the AUAR, establish the boundaries of the AUAR, and identify the development scenarios to be analyzed through this review.

The RGU must consider all timely and substantive comments received during the Scoping EAW comment period when finalizing the order for review in accordance with Minnesota Rules part 4410.3610, Subpart 5a(D). As required by Minn. Rules, the RGU has provided replies to comments that are substantive. Responses to comments are organized by AUAR Item number.

Four agencies submitted comments on the Scoping EAW. Two citizen comments were received on the Scoping EAW. The substantive comments are summarized in this appendix.

<b>Agency/Organization/Citizen</b>	<b>Letter Dated</b>	<b>Signatory</b>
Minnesota Pollution Control Agency (MPCA)	December 20, 2023	Chris Green, Project Manager, Environmental Review Unit
Minnesota Department of Transportation (MnDOT)	December 29, 2023	Maren Webb, MPP, Principal Planner, District 1
Minnesota Department of Natural Resources (MNDNR)	January 3, 2024	Shelly Patten, NE Regional Director, MDNR
Minnesota State Historic Preservation Office	January 4, 2024	Sarah J. Beimers, Environmental Review Program Manager, SHPO
Commenter #1 - Schimpf	December 16, 2023	Schimpf
Commenter #2 - MacDonald	January 3, 2023	MacDonald

Comments received by these agencies and the public are summarized below by the Item Number from the Scoping EAW. Copies of all comments submitted are included in Appendix B. None of the comments received suggested alternative development scenarios to the two described in the Scoping EAW. Therefore, the Draft AUAR will analyze the development scenarios presented in the Scoping EAW.

#### **Item 12. Water Resources**

- 1. Comment:** The water appropriation General Permit (GP) for temporary projects cannot exceed 50 million gallons per year and must be completed within one year from the start of pumping. Extensions are only granted on a case-by-case basis. Permit applications are evaluated by MNDNR hydrologists to evaluate if the project will require an Individual Permit. The hydrologist will need information on all dewatering activities, and any other water use/appropriation to evaluate for permitting.

**Commenting Agency:** MNDNR

**Response:** Table 5 of the Scoping EAW denotes that an application for a Temporary Water Appropriation Permit for the construction dewatering would be submitted, if required. The limitations of the GP are noted. Appropriation, water use, and dewatering needs would be reviewed with the MNDNR, and the appropriate and applicable applications would be completed for permitting.

#### **Item 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)**

- 1. Comment:** I have the opinion that the scope needs to be enlarged to address potential effects of the project on birds while they are in migration, not just on the potential breeding success by migratory birds on the project site (which the document does include). The site is of course at the top of a long steep slope. This ridge, as we can call the prominent top edge of the bluff, snakes from one end of Duluth to the other. Organized monitoring of bird migration is conducted near the top of the ridge in the autumn (at Hawk Ridge, to the northeast of the project site) and spring (at Enger Park and Thompson Hill, both to the southwest) because the number of migrating birds tends to be high near the ridge. Data from these monitoring efforts go into a North American public registry. It is reasonable to expect that many of the birds in these monitored streams of migrants also pass over the project site and right next to it, although I am not aware of quantitative data from there. Note that the migrations over the site could easily include bird species that are of conservation concern but are not among those deemed by the Scoping EAW Document as potentially breeding on the site. This should not be interpreted as a suggestion by me that only species of conservation concern deserve attention in an EAW.

Those organized monitorings are of diurnal migrants, but in addition many birds migrate at night. Both diurnal and nocturnal migrants have been shown to be at risk of increased mortality

from collisions with manmade structures: [www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratorybirds](http://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratorybirds)

Structures to be built on the site will be potential hazards for migrants, often more so when they are taller. Particulars of the design and lighting of those structures will affect their degree of hazard to migrating birds. The lighting on the completed project will also be of potential importance for neighboring structural hazards: the spatial concentration of communication towers and their stabilizing cables just to the south and southwest of the project site. Although those hazards have long been there, the question for the EAW would seem to be whether future project lighting is likely to pull more migrants through the tower area, both at night and whenever weather reduces visibility. I am not aware of quantitative information about past apparent collision mortality at these towers. In addition to considering the nature of the lighting to be used, the completed project also has the potential to implement temporary changes in its lighting on specific nights when the number of migrants is expected to be especially large. Nightly forecasts of these numbers, based on radar returns, are now available: <https://birdcast.info> Attention to potential hazards to avian migrants led to modifications in the structural design and planned working procedures of the new Essentia hospital in Duluth, but the effectiveness of this has yet to be evaluated because the facility just went into use.

Duluth has long been widely known as a place where migrating birds (and not just hawks) are spatially concentrated. The City should take responsibility for assuring that this proposed project minimizes harm to migrating bird populations, while allowing construction to take place. It is not unlikely that the former high school and its lighting, designed in an era without consideration for potential effects on avian migrants, precipitated more bird deaths per year than the site did before the school was built. Although those mortality numbers are not knowable, a goal now should be to do what can be done to make the site less migrant-hazardous than it was in its high school era.

**Commenter:** Schimpf

**Response:** Your concerns regarding migration are noted. Development of the AUAR area would proceed consistent with the Federal Migratory Bird Act. Migration is a highly variable occurrence and while manmade structures and lighting may impact migration patterns, there are a number of governing factors affecting migration behaviors and patterns including weather, opportunities for rest, avoidance of predators. As it pertains to the height at which birds fly, they choose a flight altitude dependent upon the best wind conditions. This can vary according to time of day, time of year, features of the earth below, and the weather. The City of Duluth will consider the inclusion of best practices as a part of the mitigation measures to be addressed in the Draft AUAR. This could include measures such as construction materials and lighting.

- 2. Comment:** MNDNR has received your request for Natural Heritage Review for this project. We appreciate your patience. It appears that there are rare and state-listed species in the vicinity of the project. The project is still under review by our Natural Heritage staff; a letter with further

recommendations will be issued upon completion. Please follow all guidance outlined in the Natural Heritage Review Letter when it is received.

**Commenting Agency:** MNDNR

**Response:** Thank you for your partnership working with the City of Duluth on this review request and for your assistance expediting the request, to the extent you are able to. Information obtained from the Natural Heritage Review will be reviewed and integrated into the AUAR accordingly, once received.

#### **Item 15. Historic Properties**

1. **Comment:** There are no properties listed in the National or State Registers of Historic Places located in the area that will be affected by this project. However, we recommend that the AUAR address the question of whether there are intact archaeological sites within the parcel that will be developed and how impacts to those sites, if any are identified, will be addressed either through minimization of effects or alternative methods of preservation. The scoping document proposes to check the MN SHPO databases for historic properties, which is insufficient.

Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed.

**Commenting Agency:** Minnesota State Historic Preservation Office (SHPO)

**Response:** The City of Duluth will coordinate with SHPO during the preparation of the Draft AUAR to discuss the need to complete a Phase I archaeological survey prior to permitting and construction of proposed development within the AUAR area. The Draft AUAR will include a detailed desktop analysis and recommendations for additional analysis needed. The timing and phasing of development is not entirely known at this time. It is anticipated that construction of the first phase of the mixed-use project may begin in summer 2024. The mitigation plan will require a Phase I archaeological survey, including review by SHPO, prior to construction. Given that archaeological survey work is weather dependent, it is anticipated that any needed field survey would not be initiated until late spring/early summer 2024.

#### **Item 20. Transportation**

1. **Comment:** The Scoping EAW, under section 20 subheading c, identifies that “[t]he AUAR will include mitigation measures identified through the traffic impact analysis.”
  - The mitigation measures should include possible interim measures, including:
    - Mitigation measures needed for each phase of development
    - Mitigation measures needed interim before MnDOT reconstructs Central Entrance/MN 194 (currently planned to start in 2028).



- The AUAR should also outline who is expected to be responsible for each mitigation measure and what phase of development it would be needed.

**Commenting Agency:** Minnesota Department of Transportation

**Response:** A traffic impact study is underway and will be included in the Draft AUAR. The scope of the traffic impact study was prepared in partnership with MnDOT, St. Louis County, and the City of Duluth. The AUAR will address mitigation relative to the phases of development and in consideration of the status of the reconstruction of Central Entrance/MN 194. Mitigation responsibility, whether private or public, will be described to the extent possible.

### General Comments

1. **Comment:** Please provide the notice of decision on the need for an Environmental Impact Statement.

**Commenting Agency:** Minnesota Pollution Control Agency

**Response:** The City of Duluth [the responsible governmental unit RGU]] has ordered an AUAR per Minn. Rules 4100.3610, which will be prepared in place of an Environmental Impact Statement (EIS). The AUAR provides a level of analysis comparable to an EIS. Preparation of the Draft AUAR will be the next step completed in the Minnesota Environmental Policy Act (MEPA) process.

2. **Comment:** The Minnesota Department of Natural Resources (MNDNR) has conducted review of the Central High School Redevelopment Project Scoping EAW, which appears to be functioning as a draft Alternative Urban Areawide Review (AUAR) as per Minnesota Rule 4410.3610.

**Commenting Agency:** MNDNR

**Response:** The Scoping EAW is not intended to function as a Draft AUAR. The Scoping EAW was prepared consistent with Minn. Rule 4410.3610 Subp. 5a, which sets out additional procedures required when certain large specific projects are reviewed. Specifically, Minn. Rule 4410.3610 Subp. 5a, part B requires the RGU include a description of the large project, comparable to that of a Scoping EAW, in the draft AUAR order. The Scoping EAW has been prepared, and associated process carried out, to guide the Draft AUAR.

3. **Comment:** I'm flabbergasted that the City of Duluth would approve light industrial/warehouse use for this site, which would not realize the full benefit of this location.

**Commentor:** MacDonald

**Response:** Per Minn. Rule 4410.3610 Subp. 3, The RGU may specify more than one scenario of anticipated development provided that at least one scenario is consistent with the adopted comprehensive plan. Scenario A: Business Park Scenario (consisting of approximately 360,000 square feet of light industrial/warehouse distribution) is the scenario that accomplishes this requirement. Scenario B: Mixed Use Scenario (Maximum Development is based on a potential development proposed by a private developer and incorporates elements that the City intends to pursue as part of the overall development of the AUAR area. The intent of the development scenarios is to capture the potential, maximum development intensity of the AUAR area and represents the “worst case scenario” for environmental impacts studied in the AUAR. The actual development, encompassing plans proposed by a private developer, may represent a modified version of this development scenario, which may include fewer residential units and less commercial development depending on market forces.

## APPENDIX B: AGENCY AND PUBLIC COMMENTS



520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | Use your preferred relay service | [info.pca@state.mn.us](mailto:info.pca@state.mn.us) | Equal Opportunity Employer

December 20, 2023

Adam Fulton, Deputy Director  
City of Duluth  
411 West First Street, City Hall Room 160  
Duluth, MN 55802  
218-730-5580  
[planning@duluthmn.gov](mailto:planning@duluthmn.gov)

RE: Central High School Redevelopment Project – Environmental Assessment Worksheet

Dear: Adam Fulton

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Central High School Redevelopment Project (Project) located in Duluth, St. Louis County, Minnesota. The Project consists of an AUAR for an approximately 80-acre area on the site of the former Central High School near Central Entrance and H. Courtney Drive in the City of Duluth, St. Louis County, Minnesota. Two development scenarios will be evaluated as part of the AUAR which include a business park scenario consistent with the city's adopted Comprehensive Plan, and a mixed residential and commercial use scenario. Minnesota Pollution Control Agency (MPCA) staff has reviewed the EAW and have no comments at this time.

We appreciate the opportunity to review this project. **Please provide the notice of decision on the need for an Environmental Impact Statement.** Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit 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.

Sincerely,

A handwritten signature in cursive script that reads 'Chris Green'.

*This document has been electronically signed.*

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

CG:rs

cc: Dan Card, MPCA  
Tom Estabrooks, MPCA  
Aaron Hinz, MPCA  
Kirsten Barta, MPCA  
Jeff Udd, MPCA

**From:** Webb, Maren (She/Her/Hers) (DOT) <[Maren.Webb@state.mn.us](mailto:Maren.Webb@state.mn.us)>  
**Sent:** Friday, December 29, 2023 9:39 AM  
**To:** planning <[planning@DuluthMN.gov](mailto:planning@DuluthMN.gov)>  
**Cc:** Kerfeld, Douglas (DOT) <[douglas.kerfeld@state.mn.us](mailto:douglas.kerfeld@state.mn.us)>; Anderson, Bryan (DOT) <[bryan.anderson@state.mn.us](mailto:bryan.anderson@state.mn.us)>; Miles, James (DOT) <[james.miles@state.mn.us](mailto:james.miles@state.mn.us)>; Lind, Katherine (DOT) <[Katherine.Lind@state.mn.us](mailto:Katherine.Lind@state.mn.us)>  
**Subject:** Central High School Scoping EAW

Good morning,

Staff from MnDOT District 1 have reviewed the Scoping EAW document and have brief comments:

The Scoping EAW, under section 20 subheading c, identifies that “[t]he AUAR will include mitigation measures identified through the traffic impact analysis.”

- The mitigation measures should include possible interim measures, including:
  - Mitigation measures needed for each phase of development
  - Mitigation measures needed in interim before MnDOT reconstructs Central Entrance/MN 194 (currently planned to start in 2028).
- The AUAR should also outline who is expected to be responsible for each mitigation measure and at what phase of development it would be needed.

This will greatly assist in the coordination between our agencies and timing of projects. Thank you and please reach out if there are any questions. We will look forward to reviewing the draft AUAR in 2024.

Best,  
Maren Webb

**Maren Webb, MPP**  
*she/her/hers*  
Principal Planner | District 1

**Minnesota Department of Transportation**  
1123 Mesaba Avenue  
Duluth, MN 55811  
218-725-2742  
[maren.webb@state.mn.us](mailto:maren.webb@state.mn.us)  
[mndot.gov/](http://mndot.gov/)



**Minnesota Department of Natural Resources  
Northeast Regional Headquarters  
1201 East Highway 2, Grand Rapids, MN 55744**

January 3rd, 2024

Adam Fulton  
City of Duluth- Deputy Director of Planning and Economic Development  
411 West First Street, City Hall, Room 160  
Duluth, MN 55802  
Phone: 218-730-5580  
Email: [Planning@duluthmn.gov](mailto:Planning@duluthmn.gov)

**RE: Central High School Redevelopment Project Scoping Environmental Assessment Worksheet (EAW)**

Dear Mr. Fulton,

The Minnesota Department of Natural Resources (MNDNR) has conducted a review of the **Central High School Redevelopment Project Scoping EAW, which appears to be functioning as a draft Alternative Urban Areawide Review (AUAR) as per Minnesota Rule 4410.3610**. We appreciate the opportunity to review this project and encourage project proposers to continue their coordination with MN DNR and other agencies to protect natural resources and recreational opportunities.

**Water Appropriation Permitting**

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The water appropriation **General Permit (GP)** for temporary projects cannot exceed 50 million gallons per year and must be completed within one year from the start of pumping. Extensions are only granted on a case-by-case basis. Permit applications are evaluated by MNDNR hydrologists to evaluate if the project will require an **Individual Permit**. Please coordinate with Area Hydrologist, Bri Speldrich ([brianna.speldrich@state.mn.us](mailto:brianna.speldrich@state.mn.us)) or Groundwater Hydrologist, Heidi Lindgren ([heidi.lindgren@state.mn.us](mailto:heidi.lindgren@state.mn.us)) regarding permit requirements for this project. The hydrologists will need information on all dewatering activities, and any other water use/appropriation to evaluate for permitting.



**Central High School Redevelopment Project EAW**

*Adam Fulton*

*January 3, 2024*

**2** | Page

**Rare Features**

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MNDNR has received your request for Natural Heritage Review for this project. We appreciate your patience. It appears that there are rare and state-listed species in the vicinity of the project. The project is still under review by our Natural Heritage Staff; a letter with further recommendations will be issued upon completion. Please follow all guidance outlined in the Natural Heritage Review Letter when it is received.

Thank you for the opportunity to review the **Central High School Redevelopment Project EAW**. Please contact our MN DNR Northeast Regional Environmental Assessment Ecologist, Jessica Parson, with any additional questions. Jessica can be reached at (218) 328-8826 or via email at:

[jessica.parson@state.mn.us](mailto:jessica.parson@state.mn.us) .

Sincerely,

**Shelly Patten**

Digitally signed by Shelly  
Patten  
Date: 2024.01.03  
10:21:49 -06'00'

Shelly Patten  
NE Regional Director, MN DNR

CC:

*Jill Townley*

*Lisa Joyal*

*Darrell Schindler*

*Greg Root*

*Jessica Parson*

Minnesota Department of Natural Resources • NE Region 2  
1201 East Highway 2, Grand Rapids, MN 55744

January 4, 2024

Adam Fulton  
Deputy Director of Planning and Economic Development  
City of Duluth  
City Hall, Room 160  
411 W. First Street  
Duluth, MN 55802

RE: Scoping EAW – Central High School Redevelopment Project  
Duluth, St. Louis County  
SHPO Number: 2024-0436

Dear Adam Fulton:

Thank you for providing this office with a copy of the Scoping Environmental Assessment Worksheet (EAW) for the above-referenced project.

There are no properties listed in the National or State Registers of Historic Places located in the area that will be affected by this project. However, we recommend that the AUAR address the question of whether there are intact archaeological sites within the parcel that will be developed and how impacts to those sites, if any are identified, will be addressed either through minimization of effects or alternative methods of preservation. The scoping document proposes to check the MN SHPO databases for historic properties, which is insufficient.

Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website [preservationdirectory.mnhs.org](http://preservationdirectory.mnhs.org), and select "Archaeologists" in the "Specialties" box.

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

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Specialist, at 651-201-3285 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,



Sarah J. Beimers  
Environmental Review Program Manager

**From:** [David Schimpf](#)  
**To:** [planning](#)  
**Subject:** Central HS Redevelopment Project EAW  
**Date:** Saturday, December 16, 2023 11:59:52 AM

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TO: Duluth Planning and Economic Development Department

DATE: 16 December 2023

I reviewed the Scoping EAW Document for the Central High School Redevelopment Project AUAR, PL 23-127. I have the opinion that the scope needs to be enlarged to address potential effects of the project on birds while they are in migration, not just on the potential breeding success by migratory birds on the project site (which the document does include). The site is of course at the top of a long steep slope. This ridge, as we can call the prominent top edge of the bluff, snakes from one end of Duluth to the other. Organized monitoring of bird migration is conducted near the top of the ridge in the autumn (at Hawk Ridge, to the northeast of the project site) and spring (at Enger Park and Thompson Hill, both to the southwest) because the number of migrating birds tends to be high near the ridge. Data from these monitoring efforts go into a North American public registry. It is reasonable to expect that many of the birds in these monitored streams of migrants also pass over the project site and right next to it, although I am not aware of quantitative data from there. Note that the migrations over the site could easily include bird species that are of conservation concern but are not among those deemed by the Scoping EAW Document as potentially breeding on the site. This should not be interpreted as a suggestion by me that only species of conservation concern deserve attention in an EAW.

Those organized monitorings are of diurnal migrants, but in addition many birds migrate at night. Both diurnal and nocturnal migrants have been shown to be at risk of increased mortality from collisions with man-made structures: [www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds](http://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds) Structures to be built on the site will be potential hazards for migrants, often more so when they are taller. Particulars of the design and lighting of those structures will affect their degree of hazard to migrating birds. The lighting on the completed project will also be of potential importance for neighboring structural hazards: the spatial concentration of communication towers and their stabilizing cables just to the south and southwest of the project site. Although those hazards have long been there, the question for the EAW would seem to be whether future project lighting is likely to pull more migrants through the tower area, both at night and whenever weather reduces visibility. I am not aware of quantitative information about past apparent collision mortality at these towers. In addition to considering the nature of the lighting to be used, the completed project also has the potential to implement temporary changes in its lighting on specific nights when the number of migrants is expected to be especially large. Nightly forecasts of these numbers, based on radar returns, are now available: <https://birdcast.info> Attention to potential hazards to avian migrants led to modifications in the structural design and planned working procedures of the new Essentia hospital in Duluth, but the effectiveness of

this has yet to be evaluated because the facility just went into use.

Duluth has long been widely known as a place where migrating birds (and not just hawks) are spatially concentrated. The City should take responsibility for assuring that this proposed project minimizes harm to migrating bird populations, while allowing construction to take place. It is not unlikely that the former high school and its lighting, designed in an era without consideration for potential effects on avian migrants, precipitated more bird deaths per year than the site did before the school was built. Although those mortality numbers are not knowable, a goal now should be to do what can be done to make the site less migrant-hazardous than it was in its high school era.

Yours truly,  
David Schimpf  
1125 Brainerd Avenue, Duluth, 55811

## Kyle Deming

---

**From:** Ryan Pervenanze  
**Sent:** Thursday, January 4, 2024 7:22 AM  
**To:** Kyle Deming  
**Subject:** FW: Comment re: Central High School Redevelopment Scoping EAW

**From:** Tom MacDonald <>  
**Sent:** Wednesday, January 3, 2024 5:06 PM  
**To:** planning <planning@DuluthMN.gov>  
**Subject:** Comment re: Central High School Redevelopment Scoping EAW

I respectfully submit these comments regarding the Central High School Redevelopment Scoping EAW:

- I strongly feel that Scenario B should be the preferred scenario as it provides the greatest beneficial use of this site
- Scenario B includes residential development which the City of Duluth sorely needs
- Although termed the "maximum development" scenario, Scenario B appears to have a similar footprint as Scenario B, with similar impervious land cover
- Scenario B would have comparable environmental impacts on the surrounding environment as Scenario A
- Scenario B would allow residents to enjoy the spectacular view afforded by this location
- I'm flabbergasted that the City of Duluth would approve light industrial/warehouse use for this site, which would not realize the full benefit of this location.
- Light industrial & warehouse space would be better located in an existing industrial area, ideally replacing vacant industrial property

Sincerely,  
Tom MacDonald  
34th Ave E, Duluth MN 55804