December 2022 version

Environmental Assessment Worksheet

This most recent Environmental Assessment Worksheet (EAW) form and guidance documents are available at the Environmental Quality Board's website at**:** https://www.eqb.state.mn.us/. The EAW form provides information about a project that may have the potential for significant environmental effects. Guidance documents provide additional detail and links to resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item or can beaddressed collectively under EAW Item 21.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation and the need for anEIS.

1. **Project title: Dayton Transfer Station**

2. **Proposer: Curbside Waste Inc.**

   Contact person: Matt Herman
   Title: Chief Operating Officer
   Address: 18150 118th Avenue North
   City, State, ZIP: Dayton, MN, 55369
   Phone: 763-533-2500
   Fax:
   Email: matt@curbsidewaste.com

3. **RGU: Minnesota Pollution Control Agency**

   Contact person: Audrey Maass
   Title: Project Manager
   Address: 525 S Lake Ave # 400A
   City, State, ZIP: Duluth, MN 55802
   Phone: 218-302-6686
   Fax:
   Email: audrey.maass@state.mn.us

4. **Reason for EAW preparation:** (check one)

   Required:
   ☐ EIS Scoping
   ☑ Mandatory EAW

   Discretionary:
   ☐ Citizen petition
   ☐ RGU discretion
   ☐ Proposer initiated

If EAW or EIS is mandatory give EQB rule category subpart number(s) and name(s):

The Project expansion would exceed the 300,000 cubic yards (CY)/per year or more threshold for a mixed municipal solid waste station per Minn. Rule 4410.4300, Subpart 17, Item C, which states:

"For construction or expansion of a mixed municipal solid waste transfer station for 300,000 or more cubic yards per year, the PCA is the RGU.

5. **Project location:**

   - County: Hennepin
   - City/Township: City of Dayton
   - PLS Location (¼, ¼, Section, Township, Range): SE ¼, SW ¼, Section 30, Township 120, Range 22
   - Watershed (81 major watershed scale): Mississippi River
   - GPS Coordinates: 45.169258, -93.509114
   - Tax Parcel Number: 3012022430006

At a minimum attach each of the following to the EAW:

- County map showing the general location of the project;
- U.S. Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries (photocopy acceptable); and
- Site plans showing all significant project and natural features. Pre-construction site plan andpost-construction site plan.
- List of data sources, models, and other resources (from the Item-by-Item Guidance: *Climate Adaptation and Resilience* or other) used for information about current Minnesota climate trends and how climate change is anticipated to affect the general location of the project duringthe life of the project (as detailed below in item 7. Climate Adaptation and Resilience).

EXHIBITS

1. Average annual temperatures for Hennepin County from 1980 to 2025, January to December.
2. Average annual maximum temperatures for Hennepin County from 1980 to 2025, January to December.
3. Average minimum temperatures for Hennepin County from 1980 to 2025, January to December.
4. Average annual precipitation for Hennepin County from 1980 to 2025, January to December.
5. Average annual PDSI for Hennepin County from 1980 to 2025, January.
6. Average projected annual temperatures for Hennepin County.
7. Annual projected maximum temperatures for Hennepin County.
8. Annual projected minimum temperatures for Hennepin County.
9. Annual projected precipitation for Hennepin County.
10. Projected increase in number of days per year that are expected to exceed 100°F for Hennepin County.

TABLES

1. Daily vehicle operations for the current facility (based on current fleet size).
2. Project magnitude of the facility.
3. Summary of climate variables impact on the project area.
4. Interaction of proposed activities with each climate trend and projection listed in 7a.
5. Cover types.
6. Green infrastructure.
7. Tree canopy.
8. Permits and approvals.
9. Soils in the project area.
10. Public waters inventory basins and watercourses within one mile of the project area.
11. Surrounding wetland features.
12. Water wells within one-quarter mile of the project area.
13. Minnesota Pollution Control Agency What's in My Neighborhood records within one-quarter mile of the project area.
14. Emission categories for carbon footprint.
15. Average maximum number of daily trips.

16. Greenhouse Gas Emissions Summary (CO_2e in short tons per year).
17. Noise Standards.
18. Potential daily vehicle operations for the project (at current fleet size).

APPENDICES

A. Figures
    1. Project location (USGS Topography)
    2. Project location (Aerial)
    3. Existing land cover
    4. Parks and trails
    5. Farmland classification
    6. Zoning
    7. Soils
    8. Surficial hydrological resources
    9. MN well index
    10. MPCA potentially contaminated sites
B. Conditional use permit and developers agreement
C. Wetland delineation report
D. Phase I Environmental Site Assessment Report
E. Minnesota Department of Natural Resources Natural Heritage report
F. Letter response from the Minnesota State Historic Preservation office and outreach attempts to the Minnesota Indian Affairs Council and the Minnesota office of the State Archaeologist
G. GHG emissions calcs Dayton TS EAW

6. Project description:

a. Provide the brief project summary to be published in the *EQB Monitor*, (approximately 50 words).

Curbside Waste Inc. intends to transfer up to 500,000 cubic yards/year of outsourced mixed municipal solid waste, construction and demolition waste, yard waste, source separated organics, and single stream recycling at the existing transfer station (Facility) in the City of Dayton at 18150 118th Avenue North. No processing or permanent storage of waste would occur at the transfer station.

b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion include a description of the existing Facility. Emphasize: 1) construction, operation methods and features that will cause physical manipulation of the environment or will produce wastes, 2) modifications to existing equipment or industrial processes, 3) significant demolition, removal or remodeling of existing structures, and 4) timing and duration of construction activities.

Current transfer station operations summary and design capacity

Curbside Waste Inc. (Curbside) constructed the Curbside Waste headquarters, office, call center, maintenance shop, and transfer station at 18150 118th Avenue North in the City of Dayton (Project). The Project began construction in 2024 and was operational in April 2025. Project infrastructure encompasses 10.2 acres of the 14.1-acre (Project Area). The remaining 3.9 acres include a 0.5-acre stormwater pond and 3.4-acre wetland.

Curbside is currently managing yard waste from a fleet of yard waste collection trucks and trucks from other companies in the surrounding area. Collection trucks dump yard waste on the tipping-floor that is loaded into semi-trailers for final transportation to a composting facility at a rate of two or three transfer loads per day to the Vonco compost site in Becker, MN. Curbside fills trailers each afternoon and transports them to the compost Facility the next morning. Little, if any, material remains on the tipping floor overnight. The Project's operating hours are Monday through Friday from 6:00 AM to 4:30 PM. The Project operates on Saturdays following the six major holidays when they occur on a weekday. Curbside may add operating hours on Saturday in the future.

The current transfer station design can accommodate approximately 300 to 400 tons per day of material. Note that the weight of materials varies based on their density. The existing building design can manage yard waste from 30 to 40 collection vehicles per day. Current operations support the use of approximately 10 waste trucks hauling yard waste during the yard waste season (i.e., April to November), which is 25 to 33 percent of the existing potential workload capacity of the transfer station.

Current project vehicle operations summary

Curbside manages a fleet of up to 56 collection vehicles from the Facility. On a typical day, site activities include trucks collecting along commercial and residential trash and recycling routes, and residential organics and residential yard waste routes, as well as roll-off trucks collecting construction and demolition (C&D) debris. All materials other than yard waste are currently delivered to other facilities (including other transfer facilities) and trucks return to the Facility at the end of the day empty most often (with the exception of yard waste). See **Table 1** for the number of trucks that collect and transport each material type to the Project daily.

Table 1. Daily vehicle operations for the current facility (based on current fleet size)

Vehicle by route type	Vehicles per day
Commercial (Front Load)	6 to 8
Residential Trash	26 to 27
Residential Recycling	3 to 5
Residential Yard Waste	9 to 11 (seasonal April to November)
Residential Organics	1 to 2
Roll-Off Construction and Demolition	2 to 3
Semi-Tractor Trailer	6 to 8
Private Vehicles (Staff and Customers)	50 to 80
Total	**103 to 144**

There would be no significant increase in traffic to or from the Project Area if the Project were permitted to accept non-yard waste materials, as the collection trucks currently start and end their daily activities in the Project Area. Therefore, the collection trucks carrying non-yard waste materials could drop their final load of the day at the Project.

Potential future transfer station operations

The Project would support an increase in the amount of C&D debris, municipal solid waste (MSW), recycling, and source separated organics (food waste), in addition to yard waste currently transferred at the Project, resulting in up to 500,000 cubic yards/year of waste material being transferred through the Facility.

To accommodate the increased transfer of different material types, Curbside would divide the storage areas of the existing transfer station building footprint into separate bunkers for each material type. The existing transfer station building can accommodate the extra materials and volume. The Project would not need external construction or building expansion to process more material types or the volume of materials.

The materials received at the Project would change seasonally. For example, the yard waste season ends in November, as such Curbside would increase delivery of MSW, recycling, or C&D to the transfer station to capitalize on capacity during the winter months. Additionally, Curbside proposes to add the possibility of transferring small amounts of organics (food waste). Curbside would place the organics in a designated roll-off container or dumpster inside the transfer building. The total number of collection trucks and total amount of material transfer would not change.

Following Project approvals/permits to process the other materials (i.e., MSW, C&D, recycling, and organics), Curbside would load received waste material every afternoon (i.e., Monday to Friday or as described above) onto trailers that are enclosed with a tarp for transportation, and transfer material to the final disposal or processing site the following day. Occasionally, Curbside would store material overnight or over a weekend in the transfer station with the doors closed if the material cannot be loaded onto transfer semi-tractor trailers by end of day or by the end of the work week.

Odor and litter control

Curbside will manage odors and litter by moving material through the transfer station as quickly as possible. Curbside will install full coverage doors in all six openings to the transfer station, which will reduce odor and litter concerns. The Project Area is fenced with chain link fencing equipped with an outward facing barbed wire arm on top. The chain link fence and barbed wire will provide containment of litter from the Project. If needed, Curbside would add a second barbed wire arm directed inward instead of outward to capture additional litter. Staff would walk the perimeter of the site on a daily to weekly basis to make sure all litter is collected and contained.

Fire suppression and other site-specific requirements

The transfer station is plumbed for a water-based fire protection system, which Curbside has not designed or installed at this time. To support the Project, Curbside will work with the Dayton Fire Chief and other experts to design and implement a suitable fire suppression system that could provide additional fire suppression support or replace a traditional water-based deluge system.

c. Project magnitude:

Project magnitude of the Facility is provided in **Table 2**.

Table 2. Project magnitude of the facility

Description	Number
Total Project Acreage	14.1
Linear project length	Approximately 1,250 feet
Number and type of residential units	N/A
Residential building area (in square feet)	N/A
Commercial building area (in square feet)	N/A
Industrial building area (in square feet)	Transfer Station: 16,200 Office/Maintenance Building: 15,000
Institutional building area (in square feet)	N/A
Other uses – specify (in square feet)	N/A
Structure height(s)	Transfer Station: 30 feet 2 inches Office Building: 18 feet Maintenance Building: 30 feet 2 inches

d. Explain the project purpose; if the project will be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.

Curbside is seeking the ability to receive and transfer additional material types at the Project to respond to a changing business climate and ever-changing solid waste and recycling system and regulations. The Metropolitan Area solid waste and recycling systems has faced many challenges and changes since 2022. Changes in the recycling commodity markets, commercial driver shortages, inflation, rising equipment costs and changing regulations have created pressure across the industry. Regulatory requirements to collect residential and commercial organics, future recycling changes from the recently passed Extended Producer Responsibility Legislation (i.e., Packaging Waste and Cost Reduction Act: Minn. Stat. § 115A.144-115A.1463), and the potential closure of the Hennepin County Energy Recovery Center (HERC) will leave residents of the Metropolitan Area facing a long period of uncertainty regarding waste collection. Having the ability to receive and transport different waste types will provide Curbside the flexibility to continue collecting and responsibly managing waste materials and expand processing volume to help meet the waste removal needs of residents in the Metropolitan Area in an uncertain future.

Curbside, a private company, will carry out the Project. The purpose of the transfer station is to provide the Metropolitan Area surrounding the Project with increased capacity to properly dispose of MSW, C&D waste, yard waste, single stream recyclables, and organics. Curbside's primary goal is to use the existing transfer station to its design capacity to help state and local governments meet their current and future sustainability goals regarding waste disposal.

e. Are future stages of this development including development on any other property planned or likely to happen? □ Yes Ξ No

   If yes, briefly describe future stages, relationship to present project, timeline and plans for environmental review.

f. Is this project a subsequent stage of an earlier project? Ξ Yes □ No

   If yes, briefly describe the past development, timeline and any past environmental review.

Curbside presented a concept plan (application) to the City of Dayton in 2020 and again in late 2021 for the construction of the Project. The Dayton planning commission and city council provided favorable and constructive comments to the concept plan, and the application was amended to reflect the comments provided by the Dayton planning commission and city council.

In November 2022, Curbside received approval from the City of Dayton for a Conditional Use Permit (CUP)/Interim Use Permit (IUP) for a residential/commercial yard waste transfer station and a Developer's Agreement with the City of Dayton in March 2023 (Appendix B). Curbside began construction in 2024, and the transfer station became operational in April 2025. In April 2025, Curbside applied to the Minnesota Pollution Control Agency (MPCA) to accept construction and demolition waste, municipal solid waste, and single-stream recycling, which triggered development of this EAW, an Ordinance Amendment, and a Conditional Use Permit.

7. Climate adaptation and resilience:

a. Describe the climate trends in the general location of the project (see guidance: *Climate Adaptation and Resilience*) and how climate change is anticipated to affect that location during the life of the project.

Based on historical climate data from the Minnesota Department of Natural Resources (MNDNR) Minnesota Climate Trends Resource for Hennepin County from 1980 – 2025,[1] there were upward trends for five climatic variables including average temperatures, maximum temperatures, minimum temperatures, and average annual precipitation, and Palmer Drought Severity Index (PDSI). The PDSI monitors drought events and predicts drought severity, with greater values indicating drier conditions. Minnesota may experience changes in the following climatic variables because of climate change (**Exhibits 1** through **5**):

- Average temperatures have increased by 0.49°F per decade;
- Maximum temperatures have increased by 0.46°F per decade;
- Minimum temperatures have increased by 0.51°F per decade;
- Precipitation has decreased by 0.01 inches per decade; and
- PDSI has decreased by 0.1 index variables per decade for the month of January.

Exhibit 1. Average annual temperatures for Hennepin County from 1980 to 2025, January to December

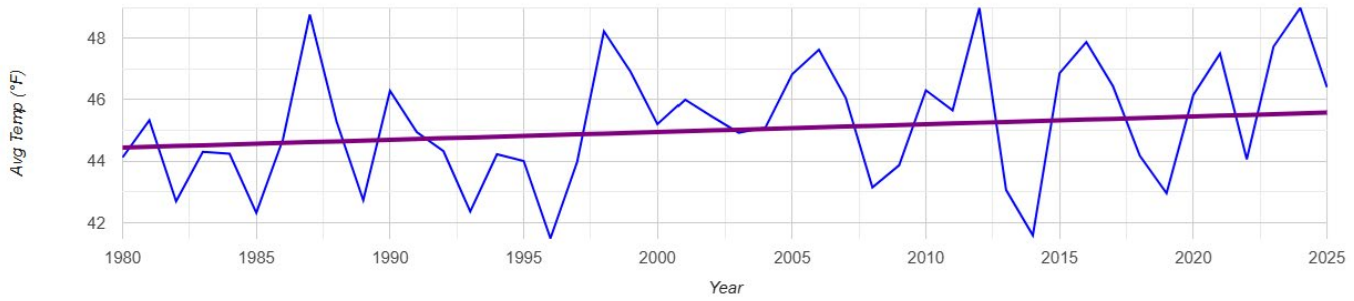


Exhibit 2. Average annual maximum temperatures for Hennepin County from 1980 to 2025, January to December

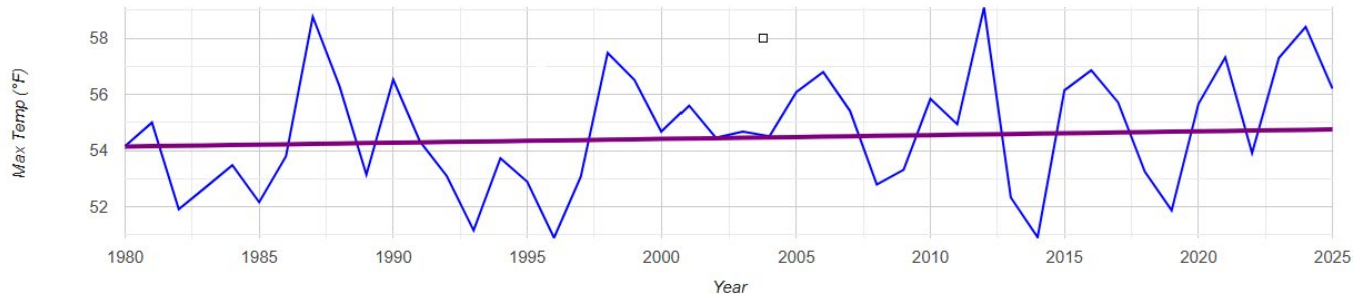
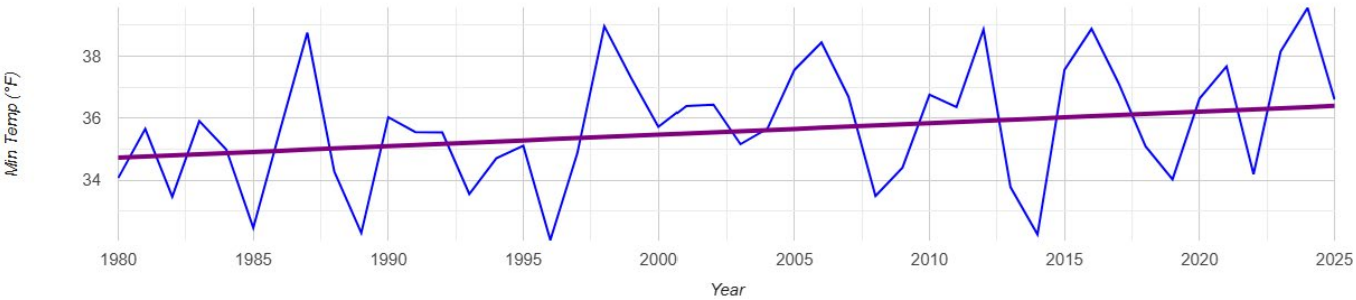


Exhibit 3. Average annual minimum temperatures for Hennepin County from 1980 to 2025, January to December



[1] *Minnesota Department of Natural Resources. 2026. Minnesota Climate Trends. Available at: https://arcgis.dnr.state.mn.us/ewr/climatetrends/*

Exhibit 4. Average annual precipitation for Hennepin County from 1980 to 2025, January to December

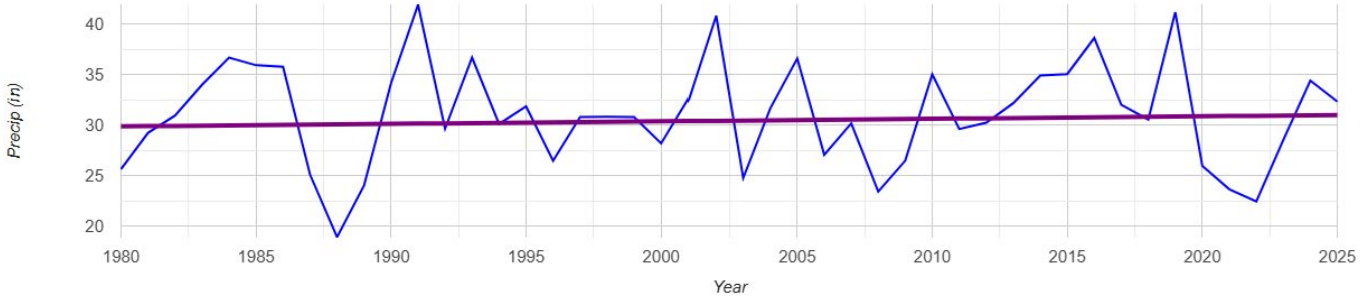
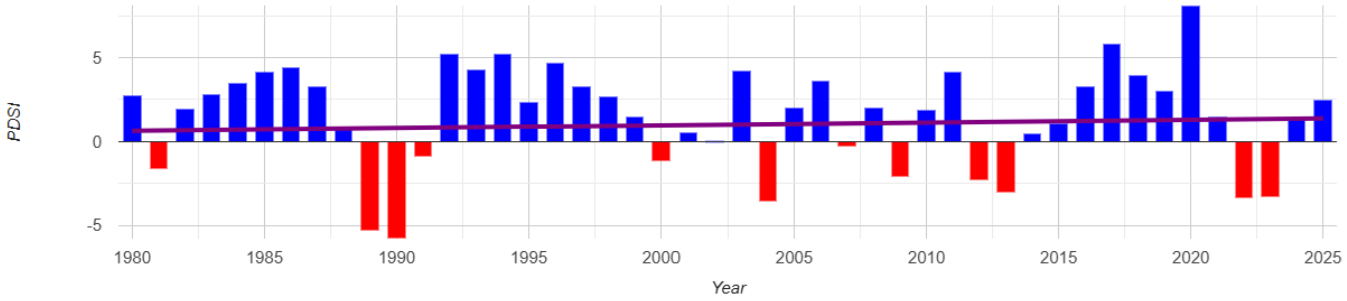


Exhibit 5. Average annual PDSI for Hennepin County from 1980 to 2025, January



The Minnesota Climate Explorer tool was used to summarize future annual climate projections for Hennepin County using historic data for four climatic variables including average temperature, maximum temperature, minimum temperature, and precipitation.[2] The model mean, depicted in blue, illustrates the average of all models included in the analysis. Best-case late-century scenarios were used for projection purposes, as it is likely that Project infrastructure will need to be updated by the turn of the century. Trends for projected climatic variables are presented in **Exhibits 6** through **9** and model means are summarized as follows:

- Annual Projected Average Temperatures: Under the best-case late-century scenario (RCP 4.5), average annual temperatures could reach 47.4°F to 55.0°F (mean 51.3°F) by 2099;
- Annual Projected Maximum Temperatures: Under the best-case late-century scenario (RCP 4.5) annual maximum temperatures could reach 53.9°F to 62.0°F (mean 57.9°F) by 2099;
- Annual Projected Minimum Temperatures: Under the best-case late-century scenario (RCP 4.5) annual minimum temperatures could reach 41.2°F to 48.5°F (mean 44.9°F) by 2099; and
- Annual Projected Precipitation: Under the best-case late-century scenario (RCP 4.5) annual precipitation could reach 17.0 to 70.8 inches (mean 32.9 inches) by 2099.

[2] *Minnesota Department of Natural Resources. 2025. Minnesota Climate Explorer. Available at: https://climate-explorer.dnr.state.mn.us/main/historical*

Exhibit 6. Average projected annual temperatures for Hennepin County.

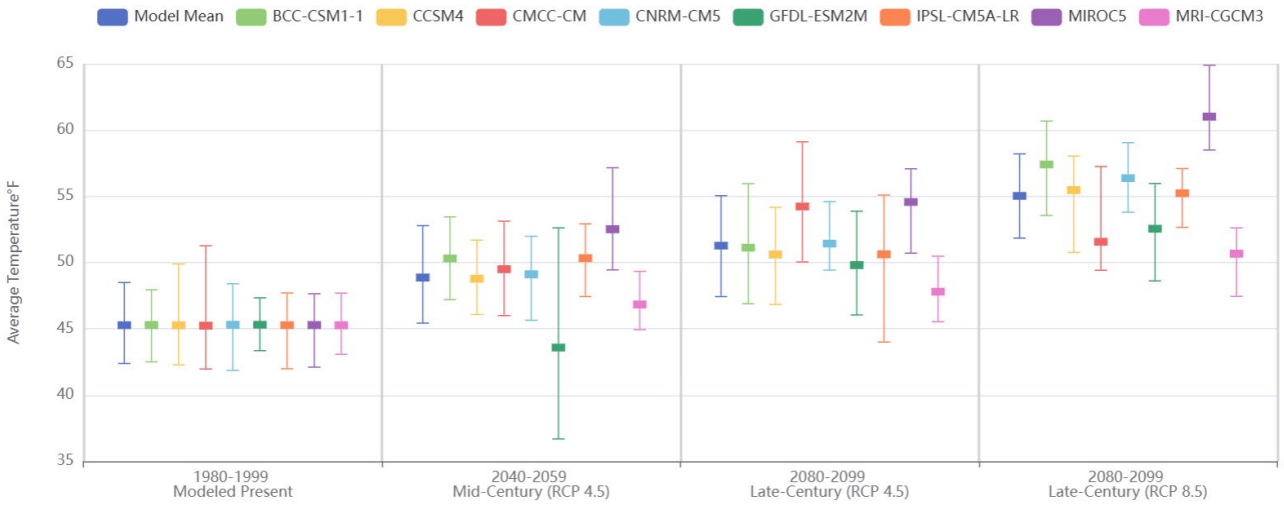


Exhibit 7. Annual projected maximum temperatures for Hennepin County.

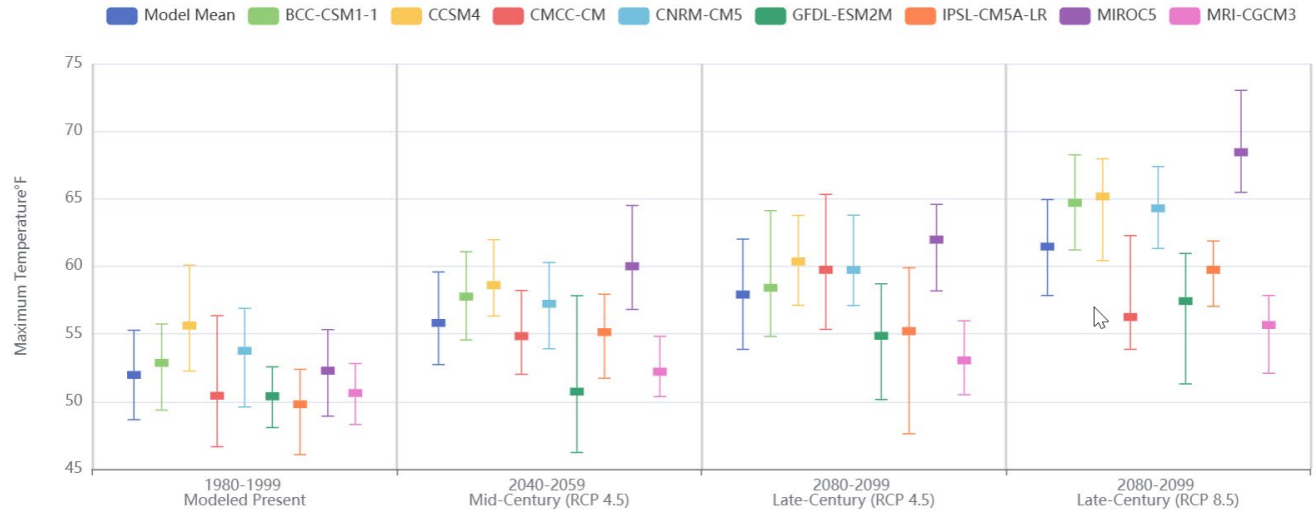


Exhibit 8. Annual projected minimum temperatures for Hennepin County.

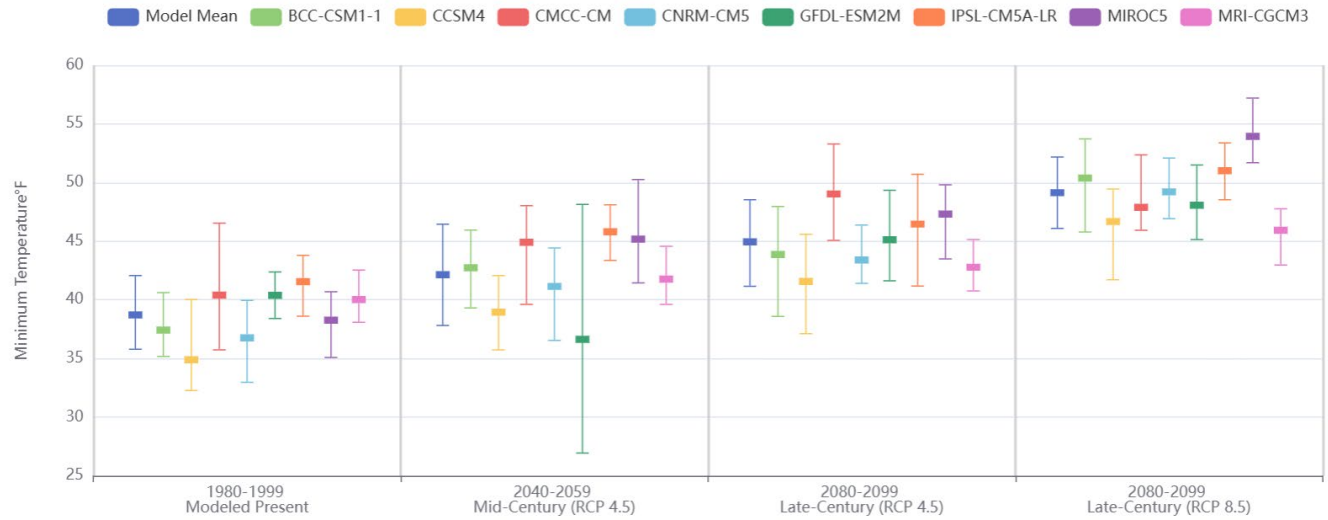
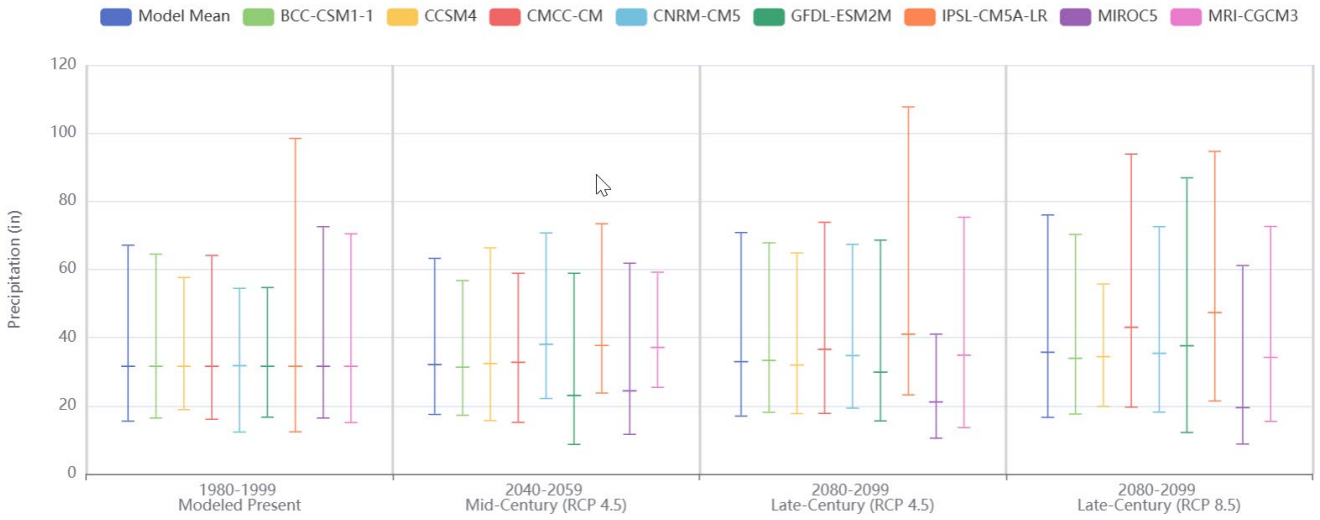
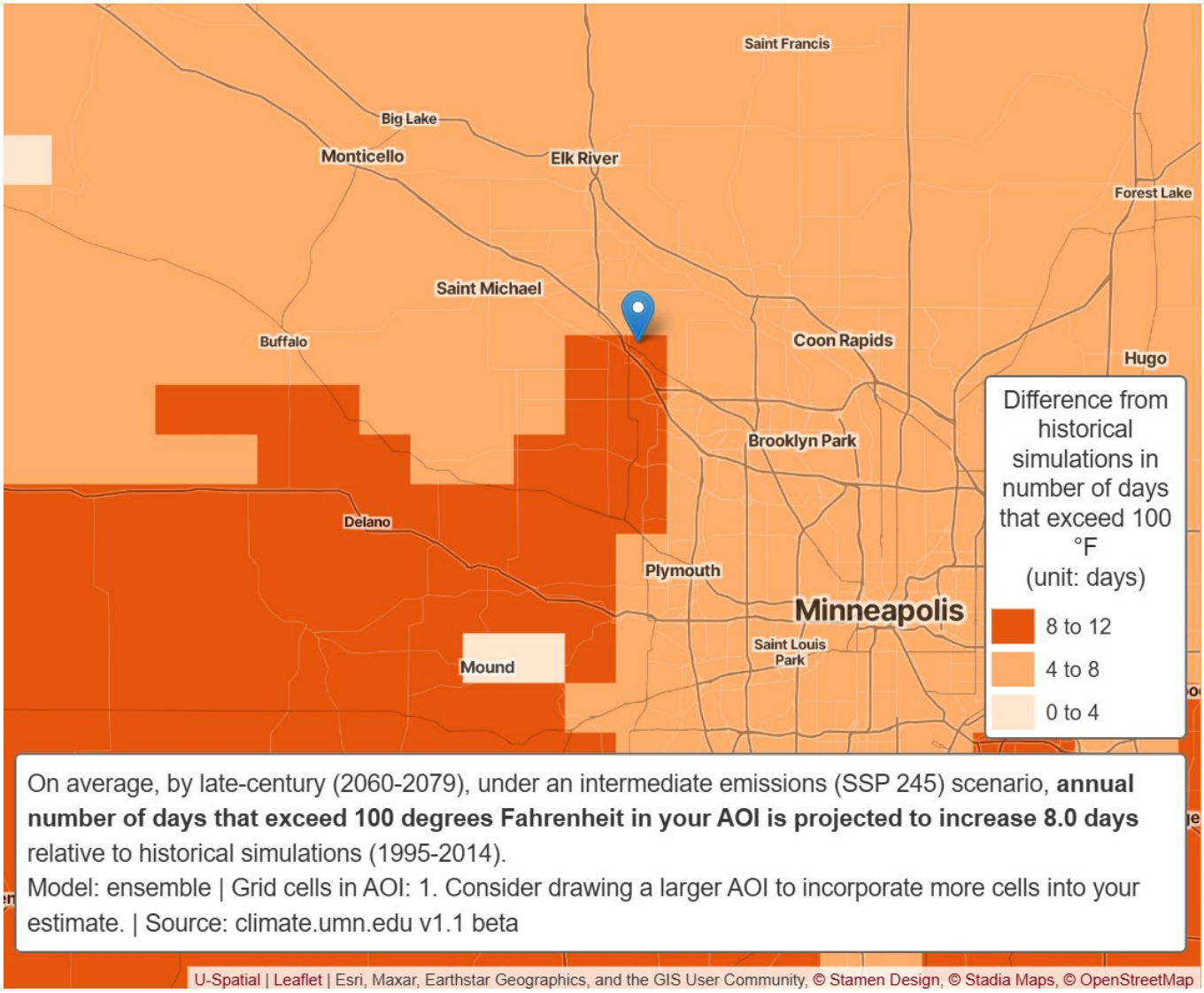


Exhibit 9. Annual projected precipitation for Hennepin County.



Based on the University of Minnesota's Minnesota Climate Mapping and Analysis Tools, the number of days projected to exceed 100°F per year is expected to increase by 8 days per year by late-century using an intermediate-emissions scenario (**Exhibit 10**).[3]

Exhibit 10. Projected increase in number of days per year that are expected to exceed 100°F for Hennepin County



Summaries of the impact of climate variables on the Project Area are provided in **Table 3**. Late-century scenarios were used for projection purposes in **Table 3**, as it is likely that Project infrastructure will need to be updated by the turn of the century.

[3] *University of Minnesota. No date. Minnesota Climate Mapping and Analysis Tools. Available at: https://app.climate.umn.edu/?output_type=numDif&scenario=ssp370_2060-2079&model=ensemble&variable=tmax-degF&time_frame=yearly&aoi=p%7EMN_outline%7E0#intro_pane*

Table 3. Summary of climate variables impact on the project area

Climate variables	Trends and projections	Location impact
Average annual temperature increasing	Average temperatures have increased by 0.49°F per decade from 1980 to 2025. Projections indicate an increase in average annual temperatures for • Best-case late-century scenario: mean 51.3°F	Increased air conditioning demands would reduce fuel efficiency of staff and customer vehicles, and waste collection and transportation vehicles. Air conditioning-related energy usage for the office building during periods of warm weather would increase and may place stress on the electrical grid. Curbside would reduce furnace-related energy usage during periods of cool/cold weather.
Average precipitation increasing; Heavier, more damaging rains (occurring on an hourly/daily scale)	Precipitation has decreased by 0.01 inches per decade from 1980 to 2025. Projections indicate an increase in average annual precipitation for • Best-case late-century scenario: mean 32.9 inches	Increased runoff from average rain increasing and heavier, more damaging rains would be directed from the Facility to the 0.5-acre stormwater pond in the Project Area. Curbside built the 0.5-acre stormwater pond to accommodate average and heavier rainfall events.
Cold weather warming	Minimum temperatures have increased by 0.51°F per decade from 1980 to 2025. Projections indicate an increase in annual minimum temperatures for • Best-case late century scenario: mean 44.9°F	Cold weather warming may result in decreased snow cover which could reduce the need for snow removal at the Facility and reduce spring flooding from snowmelt during early spring months.
Risk of heat waves increasing (exceeding 100°F)	By 2060, the annual number of days above 100°F is projected to increase by 8 compared to the 1995 to 2014 timeframe.	Increased air conditioning demands would reduce fuel efficiency of staff and customer vehicles, and waste collection and transportation vehicles. Air conditioning-related energy usage for the office building during periods of warm weather would increase and may place stress on the electrical grid.
Risk of drought increasing	Palmer Drought Severity Index (PDSI) has decreased by 0.1 index variables per decade from 1980 to 2025. Lower PDSI values correlate with wetter conditions.	An reduced risk of drought may negatively impact plant growth and survival around the stormwater pond and wetland within the Project Area.

b. For each Resource Category in the table below: Describe how the project's proposed activities and how the project's design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.

Climate and adaptation considerations related to the Project are summarized in **Table 4**. The Facility's existing infrastructure is built to the size and scale necessary to process the increase in waste material volume and type for the proposed Project. No new infrastructure will be built for the proposed Project, nor will any changes to existing land cover occur. As such, the interaction among climate trends and the proposed Project's increase in waste management volume and type is the sole Project component evaluated in **Table 4**.

Table 4: Interaction of proposed activities with each climate trend and projection listed in 7a.

Resource category	Climate variables	Project components	Potential environmental effects • Identify climate change risks & vulnerabilities. • Identify long-term impacts that climate conditions pose to proposed activities.	Adaptation strategies (with applicable timeframe – construction to end of expected lifespan)
Project design	**Average annual temperature increasing**	Increase in volume and types of non-hazardous waste materials (i.e., yard waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.	Environmental impact not foreseen with interaction between an increase in waste material volume or types and an increase in average annual temperature.	None proposed. Most waste materials will be moved within 48 hours (i.e., duration of a weekend) and the transfer station floor will be cleared every seven days per the Minnesota Administrative Rules. Therefore, waste materials will not be impacted by an increase in annual temperature.
	Average annual precipitation increasing	Increase in volume and types of non-hazardous waste materials (i.e., yard waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.	Environmental impact not foreseen with interaction between an increase in waste material volume or types and an increase in average annual precipitation.	None proposed. Curbside will temporarily store waste materials in the transfer station and will be loaded into semi-trailers that will be securely covered during transportation to their destination. Therefore, increases to waste material volume and type not be impacted by an increase in annual precipitation.
	Cold weather warming	Increase in volume and types of non-hazardous waste materials (i.e., yard waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.	Environmental impacts are not foreseen with interaction between an increase in waste material volume or types and cold weather warming.	None proposed. Most waste materials will be moved within 48 hours (i.e., duration of a weekend) and the transfer station floor will be cleared every seven days per the Minnesota Administrative Rules. Therefore, waste materials will not be impacted by cold weather warming.
	Heavier, more damaging rains	Increase in volume and types of non-hazardous waste materials (i.e., yard waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.	Environmental impacts are not foreseen with interaction between an increase in waste material volume or types and heavier, more damaging rains.	None proposed. Waste materials will be temporarily stored in a building and will be loaded into semi-trailers that will be securely covered during transportation to their destination. The transfer station roof and trailer covers will protect all waste materials from rain contact. Therefore, an increase in waste material volume and type will not be impacted by heavier, more damaging rains.
	Risk of heat waves increasing	Increase in volume and types of non-hazardous waste materials (i.e., yard	Environmental impacts are not foreseen with interaction between an increase in waste material volume or types and risk of heat waves increasing.	None proposed. Most waste materials will be moved within 48 hours (i.e., duration of a weekend) and the transfer station floor will be cleared every seven days

Resource category	Climate variables	Project components	Potential environmental effects • Identify climate change risks & vulnerabilities. • Identify long-term impacts that climate conditions pose to proposed activities.	Adaptation strategies (with applicable timeframe – construction to end of expected lifespan)
		waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.		per the Minnesota Administrative Rules. Therefore, waste material will not be impacted by risk of heat waves increasing.
	Risk of drought increasing	Increase in volume and types of non-hazardous waste materials (i.e., yard waste, municipal solid waste, construction and demolition, recycling, and organics) transferred through the Project Area.	Environmental impacts are not foreseen with interaction between an increase in waste material volume or types and increased risk of drought.	None proposed. Most waste materials will be moved within 48 hours (i.e., duration of a weekend) and the transfer station floor will be cleared every seven days per the Minnesota Administrative Rules. Therefore, waste material will not be impacted by an increase in the risk of drought.
Land Use	Impacts are addressed in Item 10. (No land use change associated with the project.)			
Water Resources	Impacts are addressed in Item 12.			
Contamination/ Hazardous Materials/ Wastes	Impacts are addressed in Item 13.			
Fish, wildlife, plant communities, and sensitive ecological resources (rare features)	Impacts are addressed in Item 14.			

8. **Cover types:** Estimate the acreage of the site with each of the following cover types before and after development:

Most of the 14.1-acre Project Area is comprised of impervious surfaces (44 percent of the Project Area [6.1 acres]), followed by lawn/landscaping (29 percent [4.1 acres]), wetlands (24 percent [3.4 acres]), and a stormwater pond (3 percent [0.5 acres]) (**Table 5**) (**Figure 3, Appendix A**). The Project will not require or involve any changes to existing cover types as the existing infrastructure was designed to process and transfer the volume of waste material requested pending approvals/permits.

There will be no changes to existing green infrastructure due to the Project. The existing 0.5-acre stormwater retention pond will remain (**Table 6**). The Project will not involve any tree removal or tree planting. The 62 trees planted when the transfer station and supporting infrastructure was constructed will remain (**Table 7**).

Table 5. Cover Types

Cover types	**Before(acres)**	**After (acres)**
Wetlands and shallow lakes (<2 meters deep)	3.4	3.4
Deep lakes (>2 meters deep)	0	0
Wooded/forest	0	0
Rivers/streams	0	0
Brush/Grassland	0	0
Cropland	0	0
Livestock rangeland/pastureland	0	0
Lawn/landscaping	4.1	4.1
Green infrastructure TOTAL (from table below*)	0	0
Impervious surface	6.1	6.1
Stormwater Pond (wet sedimentation basin)	0.5	0.5
Other (describe)	0	0
TOTAL	**14.1**	**14.1**

Table 6. Green infrastructure

Green infrastructure	**Before (acreage)**	**After (acreage)**
Constructed infiltration systems (infiltration basins/infiltration trenches/ rainwater gardens/bioretention areas without underdrains/swales with impermeable checkdams)	0.5	0.5
Constructed tree trenches and tree boxes	0	0
Constructed wetlands	0	0
Constructed green roofs	0	0
Constructed permeable pavements	0	0
Other (describe)	0	0
TOTAL	**0.5**	**0.5**

Table 7. Tree canopy

Trees	Percent	Number
Percent tree canopy removed or number of mature trees removed during development	0	0
Number of new trees planted	62	0

9. **Permits and approvals required:** List all known local, state and federal permits, approvals, certifications and financial assistance for the project. Include modifications of any existing permits, governmental review of plans and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing and infrastructure. *All of these final decisions are prohibiteduntil all appropriate environmental review has been completed. See Minnesota Rules, Chapter 4410.3100.*

A list of permits or approvals secured for the Facility and Project are provided in **Table 8**.

Table 8. Permits and approvals

Unit of Government	Type of application	Status
Minnesota Pollution Control Agency (MPCA)	National Pollutant Discharge Elimination System (NPDES) Permit	Granted on May 10, 2023. Permit Number: C00066674.
MPCA	Permit-by-Rule	Approved May 5, 2025 PBR001457
	Solid Waste Permit	To be applied for.
State Historic Preservation Office Review	Archaeological /Historic Review	Phase 1 Archeological Survey Final Report published on May 17, 2021.
City of Dayton	Development of an Industrially Guided Property including Eleven Application Requests for Master Family Investments	Approved and adopted on 11/22/2022. Resolution Number: 79-2022.
	Permit-By-Rule Notification Form	Acknowledged
	Wetland Conservation Act (Boundary Approval) Notice of Decision	Notice of City of Dayton approval of a WCA Application for Wetland Boundary and Type was sent on 9/15/2020.
	Granting Final Plat Approval of an Industrially Guided Property for Master Real Estate 2	Approved and adopted on 2/28/2023. Resolution Number 06-2023.
	Non-Residential New Construction	Approved on 11/6/2023. Permit Number: P2023-01034
	Non-Residential Plumbing Permit	Approved on 11/3/2023. Permit Number: P2023-01038
	Water Connection Permit	Approved on 6/10/2024. Permit Number: P2024-00500

Cumulative potential effects may be considered and addressed in response to individual EAW Item Nos.10-20, or the RGU can address all cumulative potential effects in response to EAW Item No.22. If addressing cumulative effect under individual items, make sure to include information requested in EAW Item No. 21.

10. Land use:

a. Describe:

i. Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, prime or unique farmlands.

Curbside constructed a transfer station and associated infrastructure (10.2 acres), the remaining land use includes a 3.4-acre wetland and 0.5-acre stormwater pond. Accordingly, existing land use is predominately industrial.

Surrounding land use includes undeveloped areas (forested), industrial lots, commercial, and scattered homesteads. A residential mobile home park (Dayton Park) is approximately 0.3 miles to the west. There are no designated parks, open space, cemeteries, or trails within or immediately adjacent to the Project Area (**Figure 4, Appendix A**). Although there were/are areas of prime farmland, farmland of statewide importance, and prime farmland if drained within the Project Area, the Project will not require construction of new or modified infrastructure (**Figure 5, Appendix A**).

ii. Plans. Describe planned land use as identified in comprehensive plan (if available) and any other applicable plan for land use, water, or resources management by a local, regional, state, or federal agency.

According to the City of Dayton 2040 Comprehensive Plan, future intended land use for the Project Area is industrial including manufacturing, warehousing, automotive, trucking, office, and other related industrial uses. No other planned land use, water use, or resource management were identified for the Project Area.

iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The City of Dayton zoning map (updated January 24, 2025) identified the Project Area as I-1 Light Industrial District (**Figure 6, Appendix A**). The Project Area is not within any shoreland, floodplain, wild or scenic river, agricultural preserve, or other critical area.

iv. If any critical facilities (i.e. facilities necessary for public health and safety, those storing hazardous materials, or those with housing occupants who may be insufficiently mobile) are proposed in floodplain areas and other areas identified as at risk for localized flooding, describe the risk potential considering changing precipitation and event intensity.

Not applicable.

b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 9a above, concentrating on implications for environmental effects.

The City of Dayton 2040 Master Plan zones the Project Area and surrounding areas to the southeast, south, west, and northwest of the Project as I-1 Light Industrial (**Figure 6, Appendix A**). Some of I-1 Light Industrial zoned areas to the south of the Project Area are also identified as being zoned for Planned Unit Development (PUD) (**Figure 6, Appendix A**). The areas north, northeast, east, and southeast of the Project Area are zoned A-1 Agricultural District (**Figure 6, Appendix A**). Therefore, the Project is compatible with surrounding zoning and land uses. The Project will not require a zoning change from the existing light industrial use.

c. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 10b above and any risk potential.

Not applicable.

11. Geology, soils and topography/land forms:

a. Geology - Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers,

or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.

The Project Area is underlain by Pleistocene aged Heiberg Member till, part of the New Ulm Formation, which consist of unsorted loam to clay loam with scattered pebbles and cobbles, and occasional boulders.[4] The unconsolidated sediments are underlain by late Cambrian aged bedrock of the Tunnel City Group with most of the site underlain by the Lone Rock Formation, which consists of interbedded sandstone and siltstone and ranges in thickness from 85 to 145 feet.[5] Additionally, the southwest portion of the Project Area is underlain by the Mazomanie Formation, which consists of cross-stratified quartzose sandstone with interbedded dolomitic sandstone up to 50 feet thick. There are no sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst formations within the Project Area. The Project will not require or involve any new construction or modifications and as such will not introduce any subsurface impacts that could influence geology. Therefore, no Project-related limitations or effects are expected, and Curbside proposes no mitigation measures.

b. Soils and topography - Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability or other soils limitations, such as steep slopes, highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 12.b.ii.

Topography within the Project Area is relatively flat, ranging from 920 to 930 feet above mean sea level.[6] According to the National Resources Conservation Service (NRCS) Web Soil Survey, five soil types were mapped within the Project Area (**Table 9**) (**Figure 7, Appendix A**).

Table 9. Soils in the project area

Map unit symbol	Map unit name	Erosion hazard	Soil drainage classification	Hydric	Acres	Percent of project area
L22C2	Lester loam, 6 to 10 percent slopes, moderately eroded	Moderate	Well drained	No	5.5	39.0
L44A	Nessel loam, 1 to 3 percent slopes	Slight	Moderately well drained	No	3.3	23.4
L49A	Klossner soils, depressional, 0 to 1 percent slopes	Slight	Very poorly drained	Yes	2.5	17.7
L23A	Cordova loam, 0 to 2 percent slopes	Slight	Poorly drained	Yes	1.6	11.3
L45A	Dundas-Cordova complex, 0 to 3 percent slopes	Slight	Somewhat poorly drained	No	1.2	8.5
Total	--	--	--	--	**14.1**	**99.9*** Does not equal 100.0 due to rounding

[4] *Berthold, A. 2018. Surficial Geology. County Atlas Series Atlas C-45, Part A. Hennepin County Plate 3.*
[5] *Retzler, A. 2018. Bedrock Geology. County Atlas Series Atlas C-45, Part A. Hennepin County Plate 2.*
[6] *Minnesota Department of Natural Resources. 2025. MnTOPO. Available at: https://mntopo.dnr.state.mn.us/*

Soils in the Project Area range from very poorly drained to well drained. NCRS erosion hazard ratings are classifications used to evaluate the potential for soil erosion within an area. The ratings are categorized as slight, moderate, severe, or very severe. The soils underlying the Project Area have slight to moderate erosion hazard ratings, indicating that high rates of erosion are unlikely under ordinary climatic conditions and with the implementation of erosion control best management practices.

As the Facility infrastructure is built and operational, no further excavation or grading activities are needed. All vehicles and equipment will use existing impermeable concrete and asphalt surfaces. Curbside does not anticipate any soil disturbance; therefore, soil integrity in the Project Area would be maintained.

- NOTE: For silica sand projects, the EAW must include a hydrogeologic investigation assessing the potential groundwater and surface water effects and geologic conditions that could create an increased risk of potentially significant effects on groundwater and surface water. Descriptions of water resources and potential effects from the project in EAW Item 12 must be consistent with thegeology, soils and topography/land forms and potential effects described in EAW Item 11.

12. Water resources:

a. Describe surface water and groundwater features on or near the site in a.i. and a.ii. below.

i. Surface water - lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, shoreland classification and floodway/floodplain, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include the presence of aquatic invasive species and the water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.

There are no lakes, streams, intermittent channels, county/judicial ditches, or special designation surficial water features within or immediately adjacent to the Project Area. There is an impaired stream (Diamond Creek: Public Waters Inventory Number 27013a) with total maximum daily loads (TMDLs) for dissolved oxygen, *Escherichia coli,* and fish bioassessments[7] and six public water basins within one mile of the Project Area[8] based on the MPCA's 2024 list (**Table 10**) (**Figure 8, Appendix A**). The six public water basins include French Lake (MNDNR Division of Waters Lake Number 27012700) and five unnamed public water wetlands.

[7] *Minnesota Pollution Control Agency. 2024. Impaired Waters: final 2024. Available at: https://mpca.maps.arcgis.com/apps/webappviewer/index.html?id=fcfc5a12d2fd4b16bc95bb535d09ae82*

[8] *Minnesota Department of Natural Resources. 2025. Public Waters (PW) Basin and Watercourse Delineations. GIS data available at: https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps_metro.html*

Table 10. Public waters inventory basins and watercourses within one mile of the project area

Public waters inventory basin/watercourse name	Public waters inventory number	Minnesota Department of Natural Resources division of waters Lake number	Approximate distance and direction from project area
Unnamed Public Water Wetland	--	27030700	0.8 miles southwest
Unnamed Public Water Wetland	--	27024000	0.7 miles southeast
Unnamed Public Water Wetland	--	27023800	0.7 miles southeast
Unnamed Public Water Wetland	--	27024100	0.9 miles southeast
Unnamed Public Water Wetland	--	27023900	0.6 miles southeast
Diamond Creek	27013a	--	0.9 miles northeast

A wetland delineation conducted on June 11, 2020, identified three wetlands comprising approximately 3.2 acres within the Project Area (**Table 11**) (**Figure 8, Appendix A**) (**Appendix C**). Note that the wetland delineation did not include the far eastern portion of the Project Area or the additional 0.2 acres of wetland (3.4 acres total). The 3-acre wetland (see **Table 11**) extends into the portion of the Project Area not included in the wetland delineation. Also, there is a stormwater pond that is approximately 0.5-acres in size that was recently created in the portion of the Project Area that was not included in the wetland delineation.

Table 11. Surrounding Wetland Features

Wetland ID	Circular 39 designation	Cowardin attribute	Total acreage	Impact acreage	Impact duration
Wetland 1	Wet Meadow/Shallow Marsh	PEMB/Cd	3.00	0	Impacts to this wetland will be avoided entirely.
Wetland 2	Wet Meadow	PEM1Bf	0.08	0	Impacts to this wetland will be avoided entirely.
Wetland 3	Seasonally Flooded Basin	PEM1A	0.07	0	Impacts to this wetland will be avoided entirely.

ii. Groundwater – aquifers, springs, seeps. Include: 1) depth to groundwater; 2) if project is within a MDH wellhead protection area; 3) identification of any onsite and/or nearby wells, including unique numbers and well logs if available. If there are no wells known on site or nearby, explain the methodology used to determine this.

The Project is within the Elm Creek Watershed Management District. There are no springs or seeps within the Project Area. Per the Minnesota Hydrogeology Atlas,[9] depth to groundwater in the area ranges from 0 to 10 feet below ground surface. The general flow of groundwater in the region surrounding the Project Area is southwest to northeast, generally trending towards French Lake (MNDNR Division of Waters Lake Number 27012700).

Per the MDH Source Water Protection Web Map Viewer,[10] the Facility is not within any Drinking Water Supply Management Areas or Wellhead Protection Areas. There are no wells within the Project Area. There are 13 wells within 0.25 miles of the Project Area (**Table 12**) (**Figure 9, Appendix A**).[11] The Facility is connected to the Maple Grove municipal water system.

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[9] *Minnesota Department of Natural Resources. 2015. Pollution Sensitivity of the Bedrock Surface, Minnesota Hydrogeology Atlas series HG-01. Available at: https://files.dnr.state.mn.us/waters/groundwater_section/mapping/mha/hg01_meta.html#ordering*

[10] *Minnesota Department of Health. No date. Source Water Protection Web Map Viewer. Available at: https://experience.arcgis.com/experience/14825b159b2e4dc686736d98e39ebce7*

[11] *Minnesota Department of Health. 2019. Minnesota Well Index (MWI). Available at: Minnesota Well Index (MWI) - Resources - Minnesota Geospatial Commons*

Table 12. Water wells within one-quarter mile of the project area

Well identification number	Well name
00470624	Codema Inc.
00555243	Olson Company
00743427	VSI Construction
00183911	Peterson, Earl A.
00492238	Christian Builders #549
00513686	Boggs, Mrs. Don
00179023	Knutson, Jerry
00410668	Spaanum, Thurber
00500596	Kahlstorf, Carol
00408653	Boggs, Donald
00523944	Witcher Const New Office
00745303	Boggs, Bob
00762358	French Lake Golf

b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects in Item b.i. through Item b.iv. below.

i. Wastewater - For each of the following, describe the sources, quantities and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site.

1) If the wastewater discharge is to a publicly owned treatment Facility, identify any pretreatment measures and the ability of the Facility to handle the added water andwaste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

Facility wastewater is discharged to the Maple Grove municipal sewer system. No pre-treatment measures are necessary for the wastewater. Facility-related wastewater production is limited to that used by a few Curbside staff and some customers. Changes or expansions to the Maple Grove municipal wastewater infrastructure are not necessary for the Project. Curbside does not have a transfer station floor cleaning protocol currently. However, they do have a small floor sweeper that may be used to clean the transfer station floor. Curbside would dispose of water from the floor sweeper down a municipal drain at the wash bay and pass through the oil/water separator before entering the wastewater line.

2) If the wastewater discharge is to a subsurface sewage treatment systems (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system. If septic systems are part of the project, describe the availability of septage disposal options within the region to handle the ongoing amounts generated as a result of the project. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity and amount with this discussion.

Not applicable.

3) If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects.

Not applicable.

ii. Stormwater - Describe changes in surface hydrology resulting from change of land cover. Describe the routes and receiving water bodies for runoff from the project site (major downstream water bodies as well as the immediate receiving waters). Discuss environmental effects from stormwater discharges on receiving waters post construction including how the project will affect runoff volume, discharge rate and change in pollutants. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity and amount with this discussion. For projects requiring NPDES/SDS Construction Stormwater permit coverage, state the total number of acres that will be disturbed by the project and describe the stormwater pollution prevention plan (SWPPP), including specific best management practices to address soil erosion and sedimentation during and after project construction. Discuss permanent stormwater management plans, including methods of achieving volume reduction to restore or maintain the natural hydrology of the site using green infrastructure practices or other stormwater management practices. Identify any receiving waters that have construction-related water impairments or are classified as special as defined in the Construction Stormwater permit. Describe additional requirements for special and/or impaired waters.

No new construction or changes in the amount of impervious surface will occur for this Project, therefore surface hydrology should not change from existing conditions. If climate change results in an increase in average annual precipitation amounts, the existing stormwater pond infrastructure should have capacity to manage the increase in volume. The actual volume of 2.45 acre-feet is 0.66 acre-feet more than the required volume of 1.79 acre-feet based on 1,800 cubic feet per acre draining to the pond. The actual abstracted volume of the stormwater pond is 2.37 acre-feet which is 0.02 acre-feet more than the required abstracted volume. As the actual capacity of the stormwater pond is overbuilt, it should be able to manage potential increases in stormwater volume that may result from climate change.

iii. Water appropriation - Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality, such as reuse of water, connections with another water source, or emergency connections.

The Facility is connected to Dayton's municipal water system. The Project will not result in a change to the water supply connection or water usage from existing conditions.

iv. Surface Waters

a) Wetlands - Describe any anticipated physical effects or alterations to wetland features such as draining, filling, permanent inundation, dredging and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed, taking into consideration how

current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed and identify those probable locations.

Curbside has already constructed the Facility; therefore no new construction or modifications are necessary for the Project. As such, the Project will not drain, fill, inundate, dredge, or remove vegetation from wetland areas. The Project will not impact the 3.2-acre wetland within the Project Area. Additionally, the presence of an existing berm and fence surrounding the Project Area would contain yard waste and minimize or avoid litter contamination of nearby wetlands. Curbside does not anticipate any wetland impacts; therefore, Curbside is not proposing mitigation.

b) Other surface waters- Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.

The Project will not drain, fill, inundate, dredge, dike, divert, impound, or remove aquatic vegetation from surface water features. The Project will not require any construction activity. The Facility has an existing stormwater pond and fencing to minimize or avoid direct or indirect effects on surface waters and avoided entirely during the operation of the Project. Curbside does not anticipate any surface water impacts; therefore, no mitigation is proposed.

13. Contamination/hazardous materials/wastes:

a. Pre-project site conditions - Describe existing contamination or potential environmental hazards on or in close proximity to the project site such as soil or ground water contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan.

Based on review of the MPCA's What's in My Neighborhood (WIMN) database,[12] the Facility has a solid waste, permit by rule (Site ID 263142) and there were 12 sites identified within one-quarter mile of the Project Area (**Table 13**) (**Figure 10, Appendix A**).

[12] *Minnesota Pollution Control Agency. 2025. What's in My Neighborhood. Available at: https://mpca.maps.arcgis.com/apps/webappviewer/index.html*

Table 13. Minnesota Pollution Control Agency What's in My Neighborhood Records within One-Quarter Mile of the Project Area

Site ID	Site name	MPCA program	Status	Location
263142	Dayton Transfer Station 18150 118th Avenue North Dayton, MN 55369	Solid Waste, Permit by Rule (PBR001457)	Active	This is the Facility.
23427	JE Dunn Construction Co. 11771 Troy Lane North Dayton, MN 55369	Aboveground Storage Tank (AST) (MN0000998260). Hazardous Waste, Very small quantity generator (TS0122335)	Active 300-gallon AST storing used oil (Installed 4/15/1993). Active hazardous waste generator of automotive cleaning solvents for years 1985, 2008, 2009, 2010, 2011, 2013, 2014, 2016, 2017, 2018, 2019, 2020, 2021, 2023, and 2024.	Approximately 0.19 miles southwest of the Project Area.
252244	Dayton 94 and Troy Lane Extension Dayton, MN 55369	Construction Stormwater Permit (C00064146)	Inactive (Permit issued 6/21/2022 and terminated 10/24/2024)	Approximately 0.18 miles south of the Project Area.
255461	MTL Troy Lane Addition Troy Lane North Dayton, MN 55369	Construction Stormwater Permit (C00066674)	Inactive (Permit issued 5/10/2023 and terminated 7/18/2023)	Approximately 0.16 miles west of the Project Area.
23047	Prokart Indoors - Maple Grove 11700 Troy Lane North Dayton, MN 55369-9279	Hazardous Waste - Minimal quantity generator (MND985771435)	Active hazardous waste generator of cleaning solvents/non-chlorinated solvents for years 2014, 2016, 2017, 2018, 2019, 2020, 2021, 2023, 2024 and 2025.	Approximately 0.21 miles southwest of the Project Area.
252977	West French Lake Road 17400 117th Street West and north to 12100 West French Lake Road	Construction Stormwater Permit (C00064714)	Active (Permit issued 8/12/2022)	Approximately 60 feet northeast of the Project Area.
185775	VSI Construction 11751 Troy Lane Dayton, MN 55369	Brownfields, Petroleum Brownfield (PB4443)	Inactive (Site closed 10/31/2013)	Approximately 0.2 miles southwest of the Project Area.
231561	Spears Manufacturing 12700 West French Lake Road Dayton, MN 55327	Construction Stormwater Permit (C00054458)	Inactive (Permit issued 7/23/2019 and terminated 8/20/2021)	Approximately 0.17 miles northeast of the Project Area.

Site ID	Site name	MPCA program	Status	Location
31973	Codema LLC 11790 Troy Lane North Suite A Maple Grove, MN 55369-4705	Hazardous Waste - Very small quantity generator (MND985745645)	Active hazardous waste generator of washing solvents and waste paint for years 2008, 2009, 2010, 2011, 2013, 2014, 2016 , 2017, 2018, 2019, 2020, 2021, 2023, 2024 and 2025.	Approximately 0.18 miles southwest of the Project Area.
186781	Dayton Park Dump Dayton, MN 55369	Site Assessment (SA0007676)	Inactive (Site closed 1/11/2000)	Approximately 0.19 miles northwest of the Project Area.
216587	Elevation Coating Warehouse 11790 Troy Lane North Suite B Maple Grove, MN 55369-4734	Hazardous Waste (MNS000312136)	Inactive. The last reported hazardous waste generator license application was registered 9/10/2024. This site was a previous hazardous waste generator of waste paint/paint thinner for years 2017, 2018, 2019, 2020, 2021, 2023 and 2024.	Approximately 0.18 miles southwest of the Project Area.
254163	West French Lake Road West French Lake Road Dayton, MN 55327	Construction Stormwater Permit (C00065683)	Inactive (Permit issued 1/18/2023 and terminated 9/23/2024)	Approximately 60 feet northeast of the Project Area.
252760	Dayton Fields 121st and French Lake Road West Dayton, MN 55369	Construction Stormwater Permit (C00064484)	Active (Permit issued 7/22/2022)	Approximately 0.14 miles northwest of the Project Area.

Braun Intertec Corportation completed a Phase I Environmental Site Assessment (ESA) on May 16, 2023, prior to construction of the Facility. The results of the Phase I ESA are provided in Appendix D. As the Project will not require construction, Curbside does not anticipate that potentially contaminated sites within the vicinity of the Project Area will be exposed or exacerbated.

b. Project related generation/storage of solid wastes - Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage and disposal. Identify measures to avoid, minimize or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.

Curbside would generate minimal solid waste at the transfer station during operation. Specifically, MSW and single-stream recyclables may be generated by Curbside staff throughout the work week (i.e., single-use plastic or aluminum cans).

Potential environmental effects include contamination from improper disposal/littering. Trash and recycling bins would be co-located and available in multiple locations for Curbside staff and customers to properly dispose of items while on-site. Curbside staff would receive environmental/compliance training regarding the proper disposal of waste. Curbside will install full coverage doors on all six openings to the transfer station, and operational plans would aim to strategically deliver materials when wind speeds are high and could blow material outside the building, which will help keep material contained in the transfer station. Curbside staff would walk the perimeter of the site on a daily to weekly basis to make sure all litter is collected and contained. If needed, Curbside would add a second barbed wire arm that leans inward instead of outward to capture additional litter in addition to the current chain link fence surrounding the Project. There may be occasional temporary storage of waste materials overnight or over a weekend within the transfer station with the doors closed. Curbside will remove waste materials stored overnight or over a weekend on the following operations day. Curbside will dispose of all waste materials at an appropriate permitted Facility. Curbside will comply with Minnesota Administrative Rule 7035.2870 Subp. 5H, which requires that transfer station floors be cleared every seven days.

c. Project related use/storage of hazardous materials - Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location and size of any new above or below ground tanks to store petroleum or other materials. Indicate the number, location, size and age of existing tanks on the property that the project will use. Discuss potential environmental effects from accidental spill or release of hazardous materials. Identify measures to avoid, minimize or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

Curbisde will not use or store any chemicals or hazardous materials at the Project Area during operation. No new above or below ground tanks to store petroleum or other materials would be constructed or used during operation. Spills resulting from non-hazardous liquid wastes would be addressed by the trench drains and spill kits stored onsite as needed.

d. Project related generation/storage of hazardous wastes - Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize or mitigate adverse effects from the generation/storage of hazardous waste including source reduction and recycling

Curbside will not generate, accept, or store any hazardous waste in the Project Area during operation. Curbside will not accept any hazardous solid waste for temporary storage or for transfer to the Project Area. Customers attempting to dispose of hazardous solid waste at the Facility would be informed of the waste acceptance policies and directed to nearby approved hazardous waste drop-off sites or other resources.

14. Fish, wildlife, plant communities, and sensitive ecological resources (rare features):

a. Describe fish and wildlife resources as well as habitats and vegetation on or in near the site.

Most of the Project Area (72 percent) is either unvegetated or heavily manicured (i.e., mowed lawn). The remaining 28 percent of the Project Area is comprised of wetlands fringed by cattails and some adjacent herbaceous upland areas interspersed with shrubs and small trees.

Fauna

Wildlife species that may use the developed portion of the Project Area include the non-native house mouse (*Mus musculus*) and house sparrow (*Passer domesticus*). Wildlife species that may use the wetland and stormwater pond portions of the Project Area include the northern leopard frog (*Lithobates pipiens)*, American toad (*Anaxyrus americanus*) and other amphibians, mallard (*Anas platyrhynchos*) and other waterfowl species, greater egret (*Ardea alba*), painted (*Chrysemys picta*) and snapping (*Chelydra serpentina*) turtles, passerines (i.e., song sparrow [*Melospiza melodia*] and red-winged blackbird [*Agelaius phoeniceus*]), and common mammalian species such as the eastern cottontail (*Sylvilagus floridanus*) and eastern meadow vole (*Microtus drummondii*). The wetlands within the Project Area may provide habitat for fish species such as the central mudminnow (*Umbra limi*).

b. Describe rare features such as state-listed (endangered, threatened or special concern) species, native plant communities, Minnesota Biological Survey Sites of Biodiversity Significance, andother sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA- **2025-001**) and/or correspondence number (MCE **2025-00682**) from which the data were obtained and attach the Natural Heritage Review letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe the results.

There are no Minnesota Biological Survey (MBS) sites of biodiversity significance or MNDNR native plant communities within the Project Area or within one mile of the Project Area. French Lake (ID No. 27012700) 0.1 miles northeast of the Project Area is categorized as a lake of high biological significance.[13] There are no old growth stands or calcareous fens within the Project Area or within one mile of the Project Area.[14]

<u>State-Listed Species</u>

An official Natural Heritage Report was received from the MNDNR on October 22, 2025. As the Project will not require new construction or modifications to existing land uses, the MNDNR determined that the Project will not negatively affect any known occurrences of rare features (**Appendix E**).

<u>Federally Listed</u>

Based on the USFWS Information of Planning and Consultation (IPaC) report, the experimental, non-essential population of whooping crane (*Grus americana*), proposed endangered salamander mussel (*Simpsonaias ambigua*), and proposed threatened monarch butterfly (*Danaus plexippus*) and western regal fritillary (*Argynnis idalia occidentalis*) may occur within the Project Area or surrounding region. Whooping cranes use a variety of habitats including marshes, wetlands, pastures, flooded agricultural fields, but they avoid areas with tall structures (i.e., trees and buildings) and areas near roads. Salamander mussels inhabit fast-flowing rivers and streams. Monarch caterpillars only occur on milkweed species (*Aslcepias* spp.) and adult monarchs will forage on a variety of flowering plants in herbaceous upland or wetland areas. Western regal fritillary caterpillars only occur in areas with abundant violets (*Viola* spp.) in tallgrass prairies and adults forage on a variety of flowering

[13] *Minnesota Department of Natural Resources. 2024. Lakes – Biological Significance. Available at: https://mnatlas.org/gis-tool/?id=k_0010*

[14] *Minnesota Department of Natural Resources. 2024. Forestry – Inventory: Old Growth. Available at: https://mnatlas.org/resources/forestry-inventory-old-growth/*

plants in tallgrass prairies. USFWS designated critical habitats were not mapped within the Project Area or within one mile of the Project Area.

Curbside has not conducted any additional habitat assessments or rare species surveys.

c. Discuss how the identified fish, wildlife, plant communities, rare features and ecosystems may be affected by the project including how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.

The Project will not require new construction or modifications to existing infrastructure. As such, Curbside does not expect any impacts to fish, wildlife, plant communities, rare features, or ecosystems within or near the Project Area. The Project proposes to increase the volume and types of waste materials transported to and from the existing transfer station building and would not alter existing or surrounding land cover or habitat. Additionally, the presence of an existing berm and fence surrounding the Facility will contain waste materials and prevent contamination of nearby natural areas.

Curbside does not expect any impacts to MBS sites of biodiversity significance or MNDNR native plant communities as there are none within the Project Area or within one mile of the Project Area. There is no suitable habitat for the whooping crane, salamander mussel, western regal fritillary, or red saltwort within the Project Area; therefore, Curbside expects no impacts to these species. Although there is potentially suitable habitat for the common gallinule and monarch butterfly in or near the wetland portion of the Project Area, Curbside does not expect the Project to impact the undeveloped areas.

Climate trends for Hennepin County suggest a projected increase in temperatures and precipitation over the coming decades. The projected changes in climate metrics could, over time, facilitate changes in plant communities in the wetland portion of the Project Area and in non-developed areas in the surrounding region. Most of the land cover within the Project Area is developed (i.e., impervious) and does not provide suitable habitat for fish, wildlife, or threatened or endangered species. Curbside does not expect the Project to contribute to climate change-related impacts to wildlife or their habitats in the Project Area or surrounding region.

Curbside mitigates the spread of invasive plant species by cleaning collection trucks regularly in their on-site wash bay. The water from cleaning collection trucks does not enter storm sewers. Some vehicle washing is done in the wash bay which connects to the sanitary system after the wash-water passes through an oil water separator. Occasionally, vehicles are washed outside by a third-party company. When vehicles are washed outside, the wash-water is reclaimed by the third-party company before disposing down the sanitary sewer system. The third-party company covers the storm drain in the primary vehicle parking area before any vehicles are washed, the water from vehicle washing is reclaimed into the truck washing vehicle or pumped to the wash bay floor drain to avoid any wash water going into the storm drain.

d. Identify measures that will be taken to avoid, minimize, or mitigate the adverse effects to fish, wildlife, plant communities, ecosystems, and sensitive ecological resources.

Project impacts (i.e., waste debris) would be contained to the Project Area with the existing fence and use of the doors that will be constructed on the transfer station and would not impart adverse effects to surrounding fish, wildlife, plant communities, ecosystems, or sensitive ecological resources. Note that the fence may impact movements of medium to large sized mammals and larger turtles. The Project will not require direct impacts to existing land cover or changes to existing infrastructure. Accordingly, Curbside is not proposing any mitigation measures.

15. Historic properties:

Describe any historic structures, archeological sites, and/or traditional cultural properties on or inclose proximity to the site. Include: 1) historic designations, 2) known artifact areas, and 3) architectural features. Attach letter

received from the State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

HDR conducted a literature review to identify recorded cultural resources within the Project Area and within 0.25 miles of the Project Area using the Minnesota Office of the State Archaeologist (OSA) Portal, the SHPO Minnesota Statewide Historic Inventory Portal (MnSHIP), the Minnesota State Historic Sites Network (MS 138.662), the State Register of Historic Places (138.664), and the National Park Service National Register of Historic Places (NRHP) web map.[15, 16, 17]

Prior to construction of the Facility in 2024, the Project Area was surveyed for archaeological sites in 2021 by Nienow Cultural Consultants. No archaeological sites were identified within the Facility footprint during the 2021 survey. The nearest archaeological site, 21HE0547 (identified during the 2021 survey), is 500 feet from the Project Area. The site consists of one precontact isolated flake. This site has not been formally evaluated for NRHP eligibility. As the site is 500 feet from the Project Area and the Project would not include ground disturbance, the Project would not impact this site. There are no other archaeological sites within 0.25 miles of the Project Area.

The literature review identified no previously inventoried historic structures on the MnSHIP portal and no historic properties on the State Register of Historic Places, State Historic Sites Network, nor eligible for or listed in the NRHP within 0.25 miles of the Project Area. SHPO concurred with the determination that no archaeological resources will be affected by the Project; and that no properties listed in the National or State Registers of Historic Places or within the Historic Sites Network will be affected by the Project on October 14, 2025 (**Appendix F**). Project review requests were made to the OSA and the Minnesota Indian Affairs Council (MIAC) via email on September 29, November 26, and December 30, 2025. Responses have not been received from OSA or MIAC at the time this EAW was prepared (**Appendix F**).

16. Visual:

Describe any scenic views or vistas on or near the project site. Describe any project related visualeffects such as vapor plumes or glare from intense lights. Discuss the potential visual effects fromthe project. Identify any measures to avoid, minimize, or mitigate visual effects.

The Great River Road is the nearest scenic byway, which is more than 4.1 miles north of the Project Area. Viewers at ground level can typically see three miles to the horizon on unobstructed terrain. However, the transfer station and associated infrastructure are already built and no expansions or modifications to the existing infrastructure will occur. Other industrial facilities, agricultural lands, and some single-family residences surround the Project Area. Agricultural and residential land uses border the Facility to the north and east and industrial uses border to the southwest. The Project would be consistent with the surrounding industrial and agricultural uses and therefore no additional visual impacts (including increases to traffic) would be incurred because of increased waste transfer capacity. The Project would be consistent with the surrounding industrial and agricultural uses.

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[15] *Minnesota Department of Administration – State Historic Preservation Office. Minnesota Statewide Historic Inventory Portal. Available at: https://mnship.gisdata.mn.gov/*

[16] *National Park Service. National Register of Historic Places. 2020. Available at: https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466*

[17] *Minnesota Department of Administration – State Archaeologist. No date. Office of the State Archaeologist (OSA) Portal. Available at: https://osaportal.gisdata.mn.gov/*

17. Air:

a. Stationary source emissions - Describe the type, sources, quantities and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants, criteria pollutants. Discuss effects to air quality including any sensitive receptors, human health or applicable regulatory criteria. Include a discussion of any methods used assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that will be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.

No stationary source emissions exist in the Project Area. No hazardous air pollutants would be emitted as no hazardous solid waste is accepted at the Facility nor would it be accepted at the Project. The Curbside anticipates minimal impact to surrounding air quality due to the Project and does not require an air permit. Therefore, no pollution control equipment is required to be installed or in operation at the Project.

b. Vehicle emissions - Describe the effect of the project's traffic generation on air emissions. Discuss the project's vehicle-related emissions effect on air quality. Identify measures (e.g. traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions.

There would be no increase in traffic to or from the Project Area as the collection trucks currently start and end their daily activities at the Facility. Therefore, the collection trucks carrying non-yard waste materials could drop their final load of the day at the Project. Curbside anticipates that other vehicles to visit the Project Area include private passenger vehicles for workers and customers, two front loaders, and semi-trucks with open trailers.

To minimize vehicle-related emissions and maintain a safe working environment, Curbside will ask drivers to turn off their engines if they are unloading accepted solid wastes onto the tipping floor from a trailer. Note that some vehicles such as packer trucks require the engine remain running to dump the material on the tipping floor. Semi-trucks engines would only run when the semi-trucks are entering or leaving the transfer station, they would not idle while being loaded with waste materials to be transferred to the final destination for the solid waste.

Only four vehicles can safely unload on the tipping floor simultaneously, which would limit the concentration of vehicle emissions in the Project Area at any given time. Trucks line up along the east/southeast side of the Facility as they stage to move through the building.

c. Dust and odors - Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under item 17a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.

The transfer station and associated infrastructure areas are paved or concrete, so dust emissions during operation would be limited to that of the accepted waste materials. The effect of dust in the vicinity of the Project would be minimal. Dust control measures include the six rolling doors which Curbside can close as needed to prevent the escape of dust generated from the waste materials being unloaded and moved on the tipping floor.

Odors from accepted waste materials are possible. The effect of odor in the vicinity of the Project may impact quality of life if not appropriately managed. Curbside will manage odors by moving material through the transfer station as quickly as possible. For example, most materials will be loaded and removed from the Project Area on a daily or next-day basis. Odor control measures include the six rolling doors, which Curbside can close as needed to limit the escape of odors from the Project to nearby sensitive receptors as well as good housekeeping procedures, limited onsite storage, and regular floor cleanings. There may be occasional temporary storage of waste materials overnight or over a weekend within the transfer station with the doors closed. Curbside will remove waste materials stored overnight or over a weekend on the following operations day. Curbside will

comply with Minnesota Administrative Rule 7035.2870 Subp. 5H, which requires that transfer station floors be cleared every seven days.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

a. GHG Quantification: For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.

As the Project will not involve any construction, only emissions from the operations phase are provided here (**Table 14**). Also, the waste materials transferred through the Project would not remain onsite long enough to contribute to Project greenhouse gas emissions. Note that the values provided throughout Item 18 below are based on the existing operations for the Facility, and that the proposed Project is expected to produce comparable levels of greenhouse gas emissions. Therefore, waste material-related greenhouse gas emissions are not expected because of the Project, and were not added here.

Table 14. Emission Categories for Carbon Footprint

Category	Scope	Project Phase	Type of Emissions
	Scope 1	Operations	Combustion (Mobile Sources)
Direct Emissions	Scope 1	Operations	Combustion (Stationary Sources)
	Scope 2	Operations	Off-Site Electricity
Indirect Emissions	Scope 3	Operations	Off-Site Waste Management

Operational Emissions – Mobile Sources

The average number of daily trips for the Project are provided in Table 15.

Table 15. Average Maximum Number of Daily Trips

Projected Vehicle Types	Trips/Day
Commercial	64
Personal	80
Total	**144**

For the Project, it was estimated that daily trips take place 307 days per year (i.e., not including Sundays or the six main holidays). It was estimated that daily trips for the 11 commercial vehicles that are used on a seasonal basis (i.e., residential yard waste collection occurs from April to November) would take place 204 days per year. The commute of workers, customers, and commercial vehicles was estimated at 30 miles daily. The total estimate of miles traveled by personal vehicles annually is 736,800 (80 vehicles x 30-mile commute x 307 days). The total estimate of miles traveled by commercial vehicles annually is 555,450 ([53 vehicles x 30-mile commute x 307 days] + [11 vehicles x 30-mile commute x 204 days]).

Gas mileage for personal vehicles was estimated at 24.7 miles per gallon.[18] Gas mileage estimates for semi-tractor trailers was 6.0 miles per gallon and for all other commercial vehicles was 4.5 miles per gallon.[19] GHG

[18] *U.S. Department of Transportation – Bureau of Transportation Statistics. 2025. Average Fuel Efficiency of U.S. Light-Duty Vehicles. Available at: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles*

[19] *U.S. Department of Energy. 2024. FOTW #1342, May 13, 2024: Average On-Road Fuel Economy for Medium/Heavy Trucks Ranged from 4.0 mpg to 10.1 mpg in 2021. Available at: https://www.energy.gov/eere/vehicles/articles/fotw-1342-may-13-2024-average-road-fuel-economy-mediumheavy-trucks-ranged-40*

emissions associated with Project-related trips were calculated at 1,480.4 short tons of carbon dioxide equivalent per year using the Emission Factors Hub.[20] Curbside does not have any compressed natural gas powered vehicles in their fleet.

Operational Emissions – Stationary Combustion

Based on the observed natural gas usage from the previous calendar year, approximately 16,750 therms or 97.7 short tons of carbon dioxide equivalent are used annually. Natural gas combustion GHG emissions were calculated using the Greenhouse Gas Equivalencies Calculator.[21]

Operational Emissions – Offsite Electricity Production

Based on estimates from observed offsite electricity usage, approximately 120,000 kilowatt hours or 52.8 short tons of carbon dioxide equivalent are used annually. Offsite electricity GHG emissions were calculated using the Greenhouse Gas Equivalencies Calculator.[22]

Operational Emissions – Waste Management

GHG emissions for Project-related waste management were determined based on how the waste is handled and by using waste generation estimates. Annual waste generation rates were calculated using a daily waste generation estimate of 75 pounds based on current generation amounts for 307 days (i.e., not including Sundays or the six main holidays). The Project-related waste generation rate is estimated at 11.5 short tons per year. GHG emissions associated with Project-related waste management was calculated at 7.3 short tons of carbon dioxide equivalent per year.

Summary

Total GHG emission estimates were calculated at 1,638 short tons of carbon dioxide equivalent per year (**Table 16**).

Table 16. Greenhouse Gas Emissions Summary (CO2e in short tons per year)

Scope	Source	Project Emissions (CO2e)
Direct Emissions		
Scope 1	Operations (Combustion - Mobile Sources)	1,480.4
Scope 1	Operations (Combustion – Stationary Sources)	97.7
Indirect Emissions		
Scope 2	Operations (Off-Site Electricity)	52.8
Scope 3	Operations (Off-Site Waste Management)	7.3
Total		**1,638.2**

b. GHG Assessment

i. Describe any mitigation considered to reduce the project's GHG emissions.

The following activities were implemented when the Facility was built to help mitigate the Facility's GHG emissions. These activities will be continued for the Project:

[20] *U.S. Environmental Protection Agency. 2025. GHG Emission Factors Hub. Available at: https://www.epa.gov/climateleadership/ghg-emission-factors-hub*

[21] *U.S. Environmental Protection Agency. 2025. Greenhouse Gas Equivalencies Calculator. Available at: https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator*

[22] *U.S. Environmental Protection Agency. 2025. Greenhouse Gas Equivalencies Calculator. Available at: https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator*

Maintaining all existing trees.

- Using energy-efficient lighting in buildings and the parking lot.
- Using energy-efficient appliances, heating, and air conditioning systems.
- Using programmable thermostats.
- Continue exploration of using electric/hybrid vehicles.

ii. Describe and quantify reductions from selected mitigation, if proposed to reduce the project's GHG emissions. Explain why the selected mitigation was preferred.

Curbside is committed to continuing the implementation of GHG emission reducing efforts through energy efficient lighting, appliances, heating and air conditioning systems, maintaining all existing trees, and using programmable thermostats. These mitigation measures were selected as they are currently being implemented. They are also considering options to include hybrid or electric vehicles in their fleet of collection trucks to reduce mobile source combustion.

iii. Quantify the proposed projects predicted net lifetime GHG emissions (total tons/#of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.

As there is no designed end to Project operations, Curbside used a 24-year lifetime to estimate net lifetime GHG emissions to align with the 2050 milestone of the Minnesota Next Generation Energy Act. Estimated GHG emissions for the next 24 years are 42,552 short tons of carbon dioxide equivalent. Note that the GHG emission estimates would be produced by the Facility and are not considered additional emissions resulting from the Project. Waste materials will be onsite briefly (i.e., typically for less than 48 hours) and will not contribute to GHG emissions in a measurable way. After the waste materials are transported to their final off-site destinations, they are estimated to contribute 728 pounds of carbon dioxide equivalent per short ton for conventional landfill disposal and 1,400 to 2,399 pounds of carbon dioxide equivalent per short ton for incineration.[23,24] The Project's GHG emissions would have a minimal effect on the State's or local area's GHG reduction goals. Therefore, Curbside proposes no further mitigation.

19. Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area, 2) nearby sensitive receptors, 3) conformance to state noise standards, and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

Noise Area Classifications (NAC) for Minn. Rules, Chapter 7030.0040 are categorized by the type of land use activities at a location and the sensitivity of those activities to noise. Residential- and institutional-type land use activities, including homes, churches, camping and picnicking areas, and hotels, are in NAC-1. Commercial-type land use activities, such as transit terminals, retail and business services, are included in NAC-2. Industrial-type land use activities, such as mining activities, are included in NAC-3 and would comprise the entirety of the proposed Project activities. MPCA noise standards are listed below in Table 17.

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[23] Johnke, B. et al. No date. Emissions from waste incineration. In: Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. Pp. 1-14. Available at: https://www.ipcc-nggip.iges.or.jp/public/gp/bgp/5_3_Waste_Incineration.pdf

[24] Manfredi, S. et al. 2009. Landfilling of waste: accounting of greenhouse gases and global warming contributions. Waste Management and Research 27(8): 825-836. Available at: https://pubmed.ncbi.nlm.nih.gov/19808732/

Table 17. Noise Standards

Noise Area Classification	Daytime		Nighttime	
	L_{50}	L10	L_{50}	L10
1: Residential-type Land Use Activities	60	65	50	55
2: Retail-type Land Use Activities	65	70	65	70
3: Manufacturing-type Land Use Activities	75	80	75	80

The Facility is at the eastern end of an established industrial park. There are four residential properties to the east across West French Lake Road. Curbside has not received any noise complaints from the residences since the Facility became operational. During the local permitting process for the Facility, conditions were established so noise from the Facility did not adversely impact nearby residences. These conditions include limiting operating hours and requiring that maintenance activity be complete indoors. For example, the east-facing maintenance building doors are not opened before 7:00 am, which reduces the level of noise outside of the building. Furthermore, on-site activities do not create prolonged noise disturbances. Vehicles that come and go throughout the day do not create excessive noise. Noise associated with maintenance activities, including any cutting, welding, or grinding, is completed inside the maintenance building. The most common noise produced on-site that would be produced is the backup beeper sound from collection vehicles and the front loader or bobcat when in use. Existing noise levels in the Project Area are influenced by traffic from nearby roads, occasional freight trains, and operation of the existing Facility. Nearby sensitive receptors include a mobile home park approximately 0.3 miles from the Facility to the west, one residence approximately 150 feet to the northeast, and four residences ranging from approximately 0.1 to 0.2 miles to the southeast. Curbside would limit all activities associated with the Project to daytime hours (not overnight) and would be in conformance with state and local noise standards. There will not be any construction-related noise as the Project is already built to handle the requested capacity of waste materials. Curbside is committed to continue complying with the noise standards set forth in Minn. Rules, Chapter 7030.0040.

20. Transportation

a. Describe traffic-related aspects of project construction and operation. Include: 1) existing and proposed additional parking spaces, 2) estimated total average daily traffic generated, 3) estimated maximum peak hour traffic generated and time of occurrence, 4) indicate source of trip generation rates used in the estimates, and 5) availability of transit and/or other alternative transportation modes.

There are currently 30 striped truck parking spaces and 54 passenger vehicle parking spaces (including two handicap spaces) in the parking lot. Additional vehicle parking takes place in an orderly fashion across the site. Curbside does not plan any additional parking spaces for the Project. The Project's operating hours are generally Monday to Friday during daytime hours (not overnight). The Project operates on Saturdays following the six major holidays when they occur on a weekday. Operating hours may be extended to include all Saturdays in the future. Curbside manages a fleet of approximately 60 collection vehicles to and from the Project Area on a typical day of operation (Table 18). Peak traffic times are from 4 AM to 7 AM and 2 PM to 5 PM. Project-related activities typically include trucks collecting waste materials along commercial and residential trash and recycling routes, residential organics and residential yard waste routes, and roll-off trucks collecting C&D debris. Curbside then loads waste materials onto trailers of semi-tractor trailers, covered, and transferred to a public or private disposal Facility in the greater metropolitan area. Curbside does not expect any changes to the number of collection vehicles or collection vehicle trips from the Project.

Curbside expects customers to follow traffic flow signage, unload their waste materials on the tipping floor or in roll-off container dumpsters, and then exit the Project Area. The Project Area will only be accessible to customers

during operating hours. Curbside will shut the doors to the transfer station, and the entrances/exits will be gated and locked outside of operating hours.

Table 18. Potential Daily Vehicle Operations for the Project (at current fleet size)

Vehicle/Route Type	Vehicles Per Day
Commercial (Front Load)	6 to 8
Residential Trash	26 to 27
Residential Recycling	3 to 5
Residential Yard Waste	9 to 11 (seasonal April to November)
Residential Organics	1 to 2
Roll-Off Construction and Demolition	2 to 3
Semi-Tractor Trailer	6 to 8
Private Vehicles (Staff and Customers)	50 to 80
Total	**103 to 144**

b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. *If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW.* Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 *(available at: http://www.dot.state.mn.us/accessmanagement/resources.html)* or a similar local guidance,

The total number of daily trips including Curbside vehicles and private vehicles are not expected to exceed 144 vehicles. Peak traffic times are in the early morning and early afternoon. Curbside does not expect traffic volume to significantly change from the existing traffic conditions due to the Project, as the same number of fleet and staff vehicles currently travel to the Facility. Therefore, Curbside does not expect any effects on traffic congestion on affected roads.

c. Identify measures that will be taken to minimize or mitigate project related transportation effects.

Curbside does not expect changes in traffic volume or peak times from the Project as collection trucks, semi-tractor trailers, and personal vehicles of Curbside staff and customers currently travel to and from the Project Area. Curbside is not proposing any traffic improvements at this time.

21. **Cumulative potential effects:** (Preparers can leave this item blank if cumulative potential effects are addressed under the applicable EAW Items)
    a. Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.
    b. Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.
    c. Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.
22. **Other potential environmental effects:** If the project may cause any additional environmental effects not addressed by items 1 to 19, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

Curbside does not anticipate any other potential environmental effects due to the Project that are not identified in items 1 through 19.

RGU CERTIFICATION. *(The Environmental Quality Board will only accept **SIGNED** Environmental Assessment Worksheets for public notice in the EQB Monitor.)*

I hereby certify that:

- The information contained in this document is accurate and complete to the best of myknowledge.
- The EAW describes the complete project; there are no other projects, stages or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60,respectively.
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature: Katrina Hapka Date: April 16, 2026

This document has been electronically signed.

Katrina Hapka
Supervisor
Environmental review Unit
Resource Management and Assistance Division