

Attachment A

Comment letters received during the 30-day public comment period
for the Goose Prairie Marsh Enhancement Project EAW
November 23, 2015 - December 23, 2015

STATE HISTORIC PRESERVATION OFFICE

December 15, 2015

MN Dept of Natural Resources
Caroline Magnuson
500 Lafayette Road, Box 25
St. Paul, MN 55155

RE: EAW – Goose Prairie Marsh Enhancement Project
T141 R44 S14, S15, S22, S26 and S27, Goose Prairie Twp, Clay County
SHPO Number: 2016-0647

Dear Ms Magnuson:

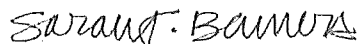
Thank you for the opportunity to review and comment on the above project. The EAW was received in our office on 23 November 2015 and has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We previously reviewed the proposed outlet ditch realignment project under SHPO No. 2016-0065 (a copy of this letter was included with the EAW). However, it appears that the project described in the Goose Prairie Marsh Enhancement Project EAW is much larger than what we reviewed for the ditch realignment in the Goose Lake WMA. We recommend that the entire project be reviewed by a MnDNR Program Archaeologist. The results of this review should be submitted to our office with recommendations regarding the effects of this project on cultural resources.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal permit or license, it should be submitted to our office by the responsible federal agency.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Mike Magner, MnDNR Forestry/Wildlife Archaeologist



Minnesota Pollution Control Agency

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

800-657-3864 | Use your preferred relay service | info.pca@state.mn.us | Equal Opportunity Employer

December 22, 2015

Ms. Caroline Magnuson
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155

Re: Goose Prairie Marsh Enhancement Project Environmental Assessment Worksheet

Dear Ms. Magnuson:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Goose Prairie Marsh Enhancement project (Project) located in Clay County, Minnesota. The Project consists of changes to improve management of surface water. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Permits and Approvals Required (Item 8)

This section indicates that a Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE) for project related wetland impacts may be necessary. Please be aware that if a USACE Section 404 *Individual* Permit is required for any project activity, then an MPCA CWA Section 401 Water Quality Certification or waiver must also be obtained as part of the permitting process. The Section 401 Water Quality Certification ensures that the activity will comply with the state water quality standards. Any conditions required within the MPCA 401 Certificate are then incorporated into the USACE 404 Permit. You can find additional information about the MPCA's 401 Certification process at www.pca.state.mn.us/water/401.html. For further information about the 401 Water Quality Certification process, please contact Jim Brist at 651-757-2245 or Bill Wilde at 651-757-2825.

Project Description (Item 6)

- The project proposer should consider incorporating a two-stage ditch design into the realignment of CD 18 from Goose Prairie Marsh to the water control structure. A sinuous, low-flow channel would likely reduce the need for future maintenance.
- With respect to the selective repair of CD 18 and Branch 1 (pg. 4), the EAW should further clarify what this could entail, such as to what grade sediment would be removed.
- The MPCA has conducted biological monitoring at two sites on Stiner Creek, which is located downstream of the project area. The fish assemblage of the stations was dominated by highly tolerant taxa, namely blacknose dace and fathead minnow. The monitoring results are consistent with the Minnesota Department of Natural Resources' (MDNR) sampling results listed on page 7 of the EAW.

Water Resources (Item 11)

In 2006 the Minnesota Pollution Control Agency (MPCA) listed the lower reach of the Wild Rice River as impaired for excess turbidity (suspended or dissolved particles) based on monitoring conducted in 2001 and 2003. The MPCA is currently assessing the Wild Rice River Watershed (HUC 09020108) against water quality standards as part of the larger Watershed Restoration and Protection Strategy (WRAPs).

Ms. Caroline Magnuson
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In April 2016, the MPCA will have completed the full watershed assessment for the Wild Rice River Watershed, and it is likely that additional water quality impairments may be identified. Similar impairments in adjacent watersheds within the Red River Basin are fish and macro invertebrate bioassessments, total suspended solids (TSS), low dissolved oxygen, and excess nutrients.

A Total Maximum Daily Load Study (TMDL) was written for the Lower Wild Rice River Turbidity (now TSS) impairment and approved by the U. S. Environmental Protection Agency on July 17, 2009. The primary contributing sources of the turbidity impairment appear to be upland soil erosion and stream-bank erosion. The turbidity impairment can also be directly correlated with higher flows, with sediment reductions near 90% needed to achieve the turbidity water quality standard during wet conditions and high flows. The Wild Rice Watershed District and its Flood Damage Reduction Project Team are the major stakeholders in creating and implementing a plan to achieve water quality standards for the lower Wild Rice River. The Project Team consists of representatives from the watershed district, state, federal and tribal agency personnel, local government officials, affected landowners and interested citizen groups.

The EAW should reference the work of the Flood Damage Reduction Team and determine how or if this project will contribute to the 90% reduction in sediment that the TMDL requires. Some estimates should be made regarding the projected reduction of sediment in pounds per year, as per the TMDL. The EAW should also indicate how or if the Flood Damage Reduction Team will provide a coordinating function to the operation and maintenance plan to consider future water quality impairments that may result from WRAPs final report. For questions regarding this matter, please contact Tim James at 218-846-8103.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and the notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW please contact me at 651-757-2508.

Sincerely,



Karen Kromar
Planner Principal
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul
Jim Ziegler, MPCA, Detroit Lakes
Tim James, MPCA, Detroit Lakes
Jim Brist, MPCA, St. Paul

From: [Jim & Bobbi](#)
To: [*Review, Environmental \(DNR\)](#)
Subject: Goose Prairie Marsh EAW
Date: Tuesday, December 22, 2015 8:07:54 PM

Caroline Magnuson
EAW Project Manager
Environmental Policy and Review Unit
Ecological and Water Resources Division
DNR
500 Lafayette Road
St Paul MN 55155-4025

We are land owners to the immediate south (upstream)of the lake. We have read some of the information. We are not necessarily against the project—But, we would be against an improperly maintained project. If the project goes forward the ditch needs to be properly maintained as needed for the life of the project as part of the project—in other words, we should not be assessed for this maintenance. The “project” needs to include the entire ditch #18 south all the way to the edge of Hitterdal. If water is retained and backed up through the ditch, an improperly maintained ditch would cause problems getting into a fair amount of the fields when needed in early spring. There are currently some very narrow spots that need to be widened substantially. The ditch has always had beaver problems and they have not disappeared.

James Dahl
16757 90th Ave S
Barnesville MN 56514

From: [Ken Dahl](#)
To: [*Review, Environmental \(DNR\)](#)
Subject: Goose Prairie Marsh EAW
Date: Wednesday, December 23, 2015 8:29:40 AM

Attn: Caroline Magnusen, EAW project manager
Environmental policy and review unit
Ecological and water resources division
DNR, 500 Lafayette Road
St Paul, MN 55155-4025

We are land owners to the immediate south (upstream) of the lake. We have read some of the information. We are not necessarily against the project—But, we would be against an improperly maintained project. If the project goes forward the ditch needs to be properly maintained as needed for the life of the project as part of the project—in other words, we should not be assessed for this maintenance. The “project” needs to include the entire ditch #18 south all the way to the edge of Hitterdal. If water is retained and backed up through the ditch, an improperly maintained ditch would cause problems getting into a fair amount of the fields when needed in early spring as the current state would be a very slow flow. There are currently some very narrow spots that need to be widened substantially. The ditch has always had beaver problems and they have not disappeared.

KENNETH DAHL
25466 28th Avenue North
Hawley, MN 56549
Cell 701-361-2275

From: hendricksonbeef@gmail.com
To: [*Review, Environmental \(DNR\)](#)
Subject: Goose Prairie Marsh EAW
Date: Wednesday, December 23, 2015 9:26:32 AM

I own the land where ditch 18 starts. In my opinion this project has not worked all the problems out. 1. The goose prairie marsh has expended in private owned land because the dnr has not maintain their section of the ditch that has resulted in water back up. 2. The dnr has not worked directly with the land owners involved 3.The dnr should look around the area and realize our land is full of wonderful areas full of wildlife and small wet lands great for maintaining the population of this wildlife. 4. I believe spending all this money instead of simply trying to give the ditch a good cleaning and lowering the marsh's water level and then doing extended water level measurements. 5. As a land owner I cannot afford being billed for any part of this expensive complicated project because of dnr 's want and I personally do not trust the dnr to be in charge of the water control level. My family has had the privilege of grazing cattle and enjoying our little piece of heaven and I employ you to do simple things first before you alter nature which I believe is mm dnr' main purpose. Thank you
Shelley Hendrickson Steichen hendricksonbeef@gmail.com
Sent from my iPad